

GREATER LONDON AUTHORITY

Jacqui Glover
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Edmonton Leaside Area Action Plan
Examination

Department: Planning
Your reference:
Our reference: LDF10/LDD18CG
Date: 18 September 2018

Email:
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Dear Jacqui

Re: Draft Edmonton Leaside Area Action Plan (ELAAP)

Thank you for inviting the Mayor of London to draft a Statement of Common Ground with Enfield in preparation for the Examination hearing sessions of the draft Edmonton Leaside Area Action Plan. Enfield has been actively engaging with officers at the Greater London Authority (GLA), and officers have had several meetings where Enfield has provided additional evidence in support of the draft ELAPP. However, the Mayor and Enfield have not been able to agree on the quantum of Strategic Industrial Land that could be lost, including the Arriva bus garage and therefore this letter answers the questions the Inspector requested, without input from Enfield.

This statement includes the views of Transport for London (TfL), which the Mayor supports. Officers at TfL have recently met with officers at Enfield. It was agreed that they would work towards producing a further Statement of Common Ground.

Firstly, I thought it would be useful to clarify the relationship between the London Plan and Local Plans in London. The Planning and Compulsory Purchase Act 2004 (as amended) is clear in S. 24 that development plan documents prepared by London boroughs must be in general conformity with the spatial development strategy (SDS) for London (referred to as the London Plan). When Enfield requested the Mayor's opinion on conformity in March 2017, the draft AAP was assessed against the SDS published in March 2016 (The London Plan. The spatial development strategy for London consolidated with alterations since 2011).

Further, the Planning and Compulsory Purchase Act 2004 (as amended) in S. 38 states that for any area in Greater London the development plan consists of the spatial development strategy, the local development plan documents and neighbourhood plans. For Enfield, the up to date development plan consists of the consolidated London Plan 2016 and the policies in Enfield's Core Strategy (2010) and Development Management document (2014), plus Enfield's AAPs that have not been superseded by the London Plan (versions 2013, 2015, 2016).

Since the Mayor provided his opinion on conformity in April 2017, the Mayor has published his draft new London Plan (December 2017) as well as the proposed Minor Suggested Changes (following the close of the consultation) on 13 August 2018 and its supporting evidence. The Examination of the draft new London Plan will begin in January 2019, with publication likely in Winter 2019/20.

The Mayor also publishes Supplementary Planning Guidance. The Upper Lee Valley Opportunity Area Planning Framework (ULVOAPF) was published by the Mayor and adopted by Enfield in 2013 and is a material consideration.

GLA Statement

Inspector's question	GLA position
Issue: Whether the preparation of the Plan has complied with the duty to co-operate imposed by S33A of the Planning and Compulsory Purchase Act 2004, as amended. Whether all the other legal requirements of the 2004 Act 9as amended) and the 2012 Regulations have been met.	
i. Is the evidence base in relation to housing and employment up to date?	<p>The GLA's up to date evidence is:</p> <p>Housing – The London Strategic Housing Land Availability Assessment (GLA 2017), The London Strategic Housing Market assessment, The London Housing Strategy (GLA 2018)</p> <p>Economy – Economic Evidence Base 2016 (GLA 2016), London Industrial Land Demand Study (CAG Consultants et al 2017), London Industrial Land Supply and Economy Study and Appendices (AECOM 2016), Wider evidence prepared for the new London Plan can be found here https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan/eip-library</p>
ii. Are there any important developments/changes since the submission of the Plan?	<p>The publication of the draft new London Plan on 1st December 2017 and its evidence base, followed by the Minor Suggested Changes (following the close of the consultation) on 13 August 2018.</p> <p>The draft new London Plan allocates Enfield an annual net housing completions target of 1,876 over 10 years, of which 983 homes a year should be delivered on small sites. It also designates Enfield as a borough that is to provide additional industrial capacity.</p> <p>The publication of the Mayor's Transport Strategy in March 2018, most importantly Policy 1 which sets out his strategic ambition and states <i>the Mayor, through TfL and the boroughs, and working with stakeholders, will reduce Londoners' dependency on cars in favour of active, efficient and sustainable modes of travel, with the central aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041.</i></p>
Issue: Whether the policies in the plan accord with the aim of the Framework, to contribute to a strong responsive and competitive economy?	
i. Are the proposed employment projections at Meridian Water justified and based on sound evidence?	<p>The assessment of the employment projections in the ELAAP: Evidence Base for Employment Land, Industries and Jobs appears to be taken from the 2016 employment projections. The assumptions around growth in office jobs and decline in industrial jobs are broadly in line with the general strategic picture set out by the GLA in the London Office Policy Review (LOPR) 2017 and the Industrial Land Demand Study.</p> <p>However, the study (ELAAP: Evidence Base for Employment Land, Industries and Jobs 2016) is fairly limited in scope, and rather than demonstrating and projecting demand for jobs growth, the study identifies various drivers that could attract more jobs. To see these as employment projections is therefore incorrect. However, it is broadly agreed that, with the right investment and regeneration, the area has capacity for, and the potential to attract, substantial growth in employment.</p>

	<p>This is reflected in the Upper Lee Valley OAPF which sets an indicative capacity of 3,000 jobs for Central Leaside, based on the GLA's evidence. Annex 2 of the London Plan notes that the improvements in public transport have the potential to unlock development capacity for the area.</p> <p>The ELAAP study is less robust when looking at drivers for industrial demand, particularly for distribution and warehousing uses. These have low employment densities and a more accurate consideration of future need would include an assessment of past trends and other indicators such as vacancy and rent levels, rather than simply looking at employment numbers.</p>
<p>ii. What would be the effects of the loss of 9.5 hectares of land designated as Strategic Employment Land (SIL) on employment in the Borough and on the wider area?</p>	<p>This question should reference Strategic Industrial Locations (SIL). There would also be a loss of Locally Significant Industrial Sites (LSIS).</p> <p>The GLA's strategic evidence suggests the loss of SIL will have a negative effect on the local and wider London economy. In addition, this AAP cannot be considered in isolation.</p> <p>Industrial capacity is not solely about employment. London depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste management including recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system¹.</p> <p>Industrial land and floorspace provide the capacity for the activities described above to operate effectively. In 2015, London had an estimated 6,976 hectares² of land in industrial and related uses of which about 50 per cent was within Strategic Industrial Locations (SILs), a further 14 per cent was in Locally Significant Industrial Sites (LSIS) designated by boroughs and the remaining 36 per cent was in Non-Designated Industrial Sites.</p> <p>Over the period 2001 to 2015, more than 1,300 hectares of industrial land was released to other uses. This was well in excess of the London Plan monitoring benchmarks³ set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG). Research indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041⁴, mostly driven by strong demand for logistics to service growth in London's economy and population. The evidence indicates that after factoring in both the positive net land demands and the management of vacancy rates, there would be scope to release a further 233 hectares of industrial land over the period 2016 to 2041, or nine hectares per annum. This compares to the current London Plan benchmark of 37 hectares per annum and recent (2010-2015) trends of</p>

¹ SEGRO, Keep London Working, 2017; Turley. Industrial Revolution, 2017

² AECOM. London Industrial Land Supply and Economy Study, GLA, 2016

³ ibid

⁴ CAG Consulting, London Industrial Land Demand Study, GLA 2017

	<p>the release of circa 100 hectares per annum. In addition, the demand assessment shows that in 2015, 185 hectares of industrial land already had planning permission to change to non-industrial use and a further 653 hectares were earmarked for potential release in Opportunity Area Planning Frameworks (including the Upper Lee Valley OAPF), Local Plans and Housing Zones⁵.</p> <p>The demand for land for industry and warehousing is not solely a function of employment. It is also driven by factors such as economic growth (GVA) and population growth. In forecasting land demand for light/general industry, the GLA's Industrial Land Demand study took into account both employment growth and development trends, and for warehousing the study took into account the relationship between GVA growth and development trends, and used this as the basis for forecasting, rather than employment. This reflects GLA officer's view that it is the function of industrial and warehousing land which is of critical importance, and this is driven more by economic growth/population, and not so much by sectoral employment trends.</p> <p>GLA calculations (see Annex 1) based on the figures provided by Enfield in September 2018 indicate there would be a net loss of 12.4ha of SIL and LSIS, plus a further 4.1ha of non-designated industrial land across the AAP area. When looking at the capacity of these sites in terms of floorspace – including the potential capacity, not just the existing floorspace, given how many of the sites are vacant or not intensively used – the proposals could mean the loss of around 80-100,000sqm of floorspace (depending on what is included and how it is calculated). In addition, GLA officers have concerns about the quality of some of the land proposed for the re-designations to SIL.</p> <p>For example, there is no evidence that the locational advantages of the SIL at Harbet Road (especially the northern part) can be replicated or re-provided elsewhere. The statement that the industrial sector is declining is based on the employment projections, but as stated above our evidence shows that there is no longer a surplus of industrial land in London, that the logistics sector in particular is growing, and that this needs to be provided for.</p> <p>Attached as Annex 1 is GLA officer's analysis of the spreadsheet of floorspace and land areas provided by Enfield in September 2018. It is not complete, in that it does not cover all industrial activity across the AAP area – but shows how GLA officers have analysed the figures provided by Enfield to come up with the numbers above.</p> <p>With regards to transport, freight is an essential user of the road network which requires SIL in the most accessible location to serve all of London. The Mayor is keen to manage freight traffic in London and reduce its environmental, safety and economic impacts. Protecting warehousing and industrial land close to key growth areas is part of that vision for London. If SIL is to be released in one part of the city TfL need to understand where those business activities would take place once the SIL is released,</p>
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⁵ Housing Zones are not a planning designation

	<p>and what effect this would have on services locally and to the rest of London.</p> <p>As stated above TfL also recommends that the release of SIL needs to be considered at the London wide scale and also linked to strategic changes to transport network beyond the life of this plan.</p>
<p>iii. How could its retention support Meridian Water?</p>	<p>SIL is a strategic London-wide designation and therefore it should be measured against its contribution to London's economy. As stated above industrial land and floorspace provide essential capacity for activities that support the functioning of London's economy and its residents and businesses.</p> <p>Table 4-1 of the GLA's Industrial Land Demand Study, shows a very sizeable amount of employment in Enfield will still be industrial by 2036 (35,400 jobs vs only 17,200 for office and research activities). Therefore, the retention of SIL will support the wide economy as well as provide potential jobs for Meridian Water.</p> <p>The Mayor strongly supports the regeneration of Meridian Water and the additional capacity for employment and homes it could bring forward, however a significant aspect of this should continue to be industrial and distribution-based activities, building on the long-term specialisms of the area. There are many existing industrial businesses in the area, the displacement of which could affect local economies and supply chains. The retention of SIL would allow the area to attract the widest range of business activity, from office-based employment and retail elsewhere in the Meridian Water and wider AAP area to light industry and heavier industrial and distribution activities in designated industrial areas. It also allows for the SIL area to serve other industrial functions in the future. Relying overly on creating mixed-use areas would restrict the operations of some potential businesses – both in terms of the types of activities they could undertake and their hours of operation – and would preclude these areas being redeveloped to meet the needs of other occupiers in the future if they are surrounded by and/or located beneath residential development.</p> <p>More specifically, TfL notes that the Arriva Bus Garage has capacity for 200 buses (only in use for 50 buses currently). This capacity would be needed to support the demand for bus arising from the growth projected by the draft ELAAP and on the wider bus network. Whilst industrial capacity is not just about jobs, Arriva have confirmed that each bus equates to 3.2 jobs. The existing bus garage includes a training academy for engineering apprentices and training across London. Arriva wish to invest further in the bus garage, including to support the Mayor's desire to see the bus fleet to zero emissions by 2037. To ensure this policy can be delivered, bus operators such as Arriva will need to invest in the electrification of bus garages across London. Arriva will only want to invest significant funds in permanent locations and will need to do this by the early 2020s. Arriva has also indicated it would consider co-location with other land uses in a new site.</p>
<p>iv. Could these effects be mitigated by the other SIL designations proposed in the</p>	<p>There is the potential to consolidate and intensify industrial capacity across the AAP area. This is reflected in the Mayor's letter of 16 March 2015 (ref D&P/LFD10/LDD05/MJ01) which did not object to some</p>

<p>plan? How are these justified?</p>	<p>release of SIL. However, to be policy compliant the new/replacement industrial capacity has to be of the quality (eg access, circulation space, form, infrastructure, facilities) and quantity to be considered SIL. Based on the current evidence the GLA is not convinced by Enfield's approach.</p> <p>In the figures provided to the GLA in September 2018, Enfield states that it can intensify the industrial land retained to the extent that they only lose 270sqm of industrial floorspace capacity. However, a number of the sites are currently vacant or are used for mainly yard-based activities. Using the 65% plot ratio in the London Plan to calculate the existing capacity of these sites gives a very different picture, with a potential loss of 80,920sqm of industrial floorspace capacity on SIL and LSIS, and a further 26,650sqm on non-designated industrial land. It is also worth noting that this does not include the Orbital business park, which is about 2.5-3.5ha of non-designated industrial land currently in use, which Enfield propose to redevelop for non-industrial uses. It also does not include additional non-industrial floorspace (c. 12,000sqm) Enfield propose as part of mixed-use areas throughout the Meridian Water masterplan area.</p> <p>For example, Enfield is proposing to designate Deephams Sewage Treatment Works as SIL. Whilst this is welcome, it will not provide additional industrial capacity over the lifetime of the ELAAP.</p> <p>In addition, and as stated above, there is no evidence that the locational advantages of the existing SIL, such as that at Harbet Road (especially the northern part) can be replicated or re-provided elsewhere.</p> <p>In addition, ensuring the consolidation and reprovision of SIL can be complex with regards to site assembly (if required), delivery, phasing in terms how to ensure the replacement SIL will be provided on another site (even through a site allocation) if sites are in different ownership/do not come forward at the same time and tied through an application. It is not clear from the draft Plan how this will be achieved.</p>
<p>v. Does the plan appropriately recognise the potential contribution of jobs from retail?</p>	<p>The Mayor welcomes the creation of a broad range of employment opportunities, and the area may well have the potential for some additional retail employment. However, given structural shifts in the retail sector it seems likely that retail growth will largely serve new communities, to complement the larger retailers already located in the area.</p>
<p>vi. Does the plan take appropriate measures to support employment uses within the plan area, including those outside Meridian Water?</p>	<p>The Mayor welcomes the measures the draft Plan takes to support growth more broadly in Meridian Water and beyond. In particular, investment in sustainable infrastructure and regeneration initiatives, however with respect to industrial employment, the draft plan does not take appropriate measures to support employment uses within the plan area, including those outside Meridian Water.</p> <p>Please see the responses above, including the example of the bus garage.</p>
<p>vii. Are the employment policies in the AAP consistent with the aims and objectives of the Local Development Framework?</p>	<p>This question should refer to the development plan, which consists of the London Plan 2016, Enfield Core Strategy (2010) and Development Management document (2014); the London Plan 2016 being the most up to date document. The ULVOAPF is also a material consideration.</p> <p>As stated above, the Mayor strongly supports the overall objective of the draft AAP to provide homes and jobs and regenerate this part of Enfield.</p>

	<p>The AAP area is located within the Upper Lee Valley Opportunity Area which, Annex 2 of the London Plan identifies, occupies the strategic position in the London-Stansted- Cambridge Peterborough growth corridor. The four trains an hour service will help unlock development capacity at Meridian Water. Annex 2 also supports the potential of a Green Enterprise District, which would provide employment. The draft AAP (policy EL15) seeks to improve infrastructure and access for the existing businesses.</p> <p>However, Annex 2 of the London Plan and the ULVOAPF also recognise the importance of retaining adequate capacity for industrial needs including waste management and strategic logistics functions which are essential to retain London’s global competitiveness and national advantage. The draft Plan does not explicitly seek to retain industrial capacity or provide additional capacity to compensate for industrial capacity that is proposed to be lost in other parts of the AAP area, such as Meridian Water.</p>
<p>viii. How will the plan respond to the business needs of existing businesses, within the Plan area?</p>	<p>It is unclear. The draft AAP should set out how the intensification of SIL will be delivered. Some of the considerations are set out in iv above. The Mayor would also seek that Enfield prepare a relocation strategy for any businesses that are displaced. This could inform the type, nature and quantum of replacement industrial land to be provided. New premises should be provided in advance of SIL being lost.</p> <p>The Mayor supports TfL’s concerns that a new site for bus garage has not been found. This would have to be in an equally convenient location of a suitable size.</p>
<p>ix. Does the Plan adequately reflect the need to protect key wharfs and the road access to them?</p>	<p>It is unclear from the draft Plan. TfL is keen to promote more water freight in London. To do that locally Enfield, in conjunction with TfL would need to define what kinds of water freight the Council would seek to grow in Edmonton Leaside and the land use and infrastructure implication, for example, Edmonton EcoPark. In the absence of specific types of growth the following actions aimed at growing water based freight are recommended:</p> <ul style="list-style-type: none"> - Protect key wharfs and road access to them through the planning process - Establish a working group with the PLA, potential freight operators, end users and Canal and Rivers trust to grow the Borough’s long term ambitions
<p>x. Would the wording proposed in policy EL2 be an effective means of achieving the aims and objectives of the Plan?</p>	<p>Whilst the Mayor strongly supports the aims and objectives of the draft Plan in general, he does not support the extent of the de-designation of SIL, particularly at Harbet Road.</p>
<p>Issue: Whether the policies in the Plan are consistent with the aim of providing the supply of housing required to meet the needs of present and future generations.</p>	
<p>i. Is the level of housing development which is proposed in the AAP justified and based on sound evidence? Is it consistent with local and national policy?</p>	<p>The ELAAP area falls within the Upper Lee Valley Opportunity Area, which is a strategic growth area for London. The Mayor welcomes, Enfield’s ambitions to deliver 10,000 homes in the AAP area. This is in line with the Mayor’s priority to deliver the much needed housing that Londoner’s need. However, this must be balanced with the overall objectives of the London Plan and its wider policies and evidence. The draft London Plan no longer includes a density matrix but seeks to optimise density by evaluating an areas capacity (policies D1 and D2). In this regard, TfL has</p>

	<p>advised that this higher housing figure requires investment in public transport services, which includes train services, bus services, bus infrastructure as well as the infrastructure of Crossrail 2 to support it.</p> <p>This is reflected in the London SHLAA 2017. Enfield’s existing and proposed housing targets, do not include the additional 5,000 homes proposed by Enfield which would increase the draft AAPs target to 10,000 homes. Enfield’s proposed new housing target is based on the Mayor’s strategic strategy of protecting the Green Belt and SIL capacity and intensifying accessible location, including on small sites.</p> <p>However, as stated above, and as per his letters 16 March 2015 and 7 July 2017, the Mayor strongly supports the delivery of housing across most of Meridian Water. GLA officers are working with Enfield to support them in its Housing Infrastructure Fund bid for the eastern section of the Meridian Water area in order to facilitate the delivery of housing. Perhaps to support the numbers more clearly, Enfield could set out a clear phasing of housing delivery and the uplift in housing numbers that would be achieved due to Crossrail 2.</p>																																										
<p>ii. Is the proportion of affordable housing proposed consistent with other local and national planning policy. What justification is given for any departure from it?</p>	<p>The Mayor welcomes the ambition to deliver 50% affordable housing across the ELAAP area. To benefit from the Mayor’s threshold approach as set out in his Affordable Housing and Viability SPG and draft new London Plan (policy H6) schemes should achieve a minimum of 35% affordable housing, or 50% where there is a loss of industrial floorspace.</p>																																										
<p>iii. Is the housing mix consistent with other local and national planning policy? What justification is given for any departure from it?</p>	<p>The London Plan encourages a range of housing choices. With regards to housing mix, the London SHMA 2017 (the latest evidence) identified the following need:</p> <table border="1" data-bbox="584 1205 1445 1451"> <thead> <tr> <th>Tenure</th> <th>1 bed</th> <th>2 bed</th> <th>3 bed</th> <th>4+ bed</th> <th>Total</th> <th>% of total</th> </tr> </thead> <tbody> <tr> <td>Market</td> <td>10,682</td> <td>2,043</td> <td>4,101</td> <td>6,210</td> <td>23,037</td> <td>35%</td> </tr> <tr> <td>Intermediate</td> <td>4,334</td> <td>3,434</td> <td>2,409</td> <td>1,693</td> <td>11,869</td> <td>18%</td> </tr> <tr> <td>Low-cost rent</td> <td>21,318</td> <td>5,311</td> <td>2,462</td> <td>1,881</td> <td>30,972</td> <td>47%</td> </tr> <tr> <td>Total</td> <td>36,335</td> <td>10,788</td> <td>8,971</td> <td>9,783</td> <td>65,878</td> <td>100%</td> </tr> <tr> <td>% of total</td> <td>55%</td> <td>16%</td> <td>14%</td> <td>15%</td> <td>100%</td> <td></td> </tr> </tbody> </table> <p>This has informed draft London Plan H12 which states for low cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs, but boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes. Such requirements are inflexible and can fail to meet the intended need, for example, family-sized homes often end up being occupied by sharing adults rather than families, and inflexible requirements can prevent otherwise suitable sites coming forward for residential development.</p> <p>If the borough wants family housing delivered in the initial phases, it should ensure the appropriate physical and social infrastructure is provided at the same time.</p>	Tenure	1 bed	2 bed	3 bed	4+ bed	Total	% of total	Market	10,682	2,043	4,101	6,210	23,037	35%	Intermediate	4,334	3,434	2,409	1,693	11,869	18%	Low-cost rent	21,318	5,311	2,462	1,881	30,972	47%	Total	36,335	10,788	8,971	9,783	65,878	100%	% of total	55%	16%	14%	15%	100%	
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<p>iv. Would the wording proposed in policy EL1 be an</p>	<p>The transport infrastructure needs to be in place before this policy can be effective. Wider physical and social infrastructure also needs to be</p>																																										

effective means of achieving the aims and objectives of the Plan?	provided to support new residents, especially families.
Issue: Whether the Plan would secure high quality and inclusive design, which would protect and enhance the built, natural and historic environment.	
i. Would the policies in the plan provide homes fit to live in for existing and future generations? Does the Plan reflect local and national guidance in this regard?	The draft Plan should adopt London Plan policy 3.5 Quality and design of housing developments to ensure dwellings are of an adequate size and fit for purpose as well as London Plan policy 3.8 Housing choice, parts c and d to ensure homes are fit for existing and future generations.
ii. Are the policies in the plan (EL9, EL10, EL11 and EL12) appropriate and achievable in relation to: a. tall buildings b. active frontages c. the provision of open space d. the integration of river and canal corridors e. design for health and well-being	a. b. d. e. draft policy EL10, EL11, E12 – The Mayor supports the draft APP’s approach to form, character and good design. Draft London Plan policies D1 and D2 provide further principles Enfield should when master planning the area. c. draft policy EL9 - The Mayor is pleased that the policies seek to protect and enhance the Lee Valley Regional park. These are strong objectives of Annex2 of the London Plan and the ULVOAPF. The London Plan policy states that the borough should assess local open space needs and ensure they are planned for. The Mayor is content for Enfield to lead on this matter.
Specifically, in relation to the comments provided on behalf of Transport for London: Issue: Does the plan provide an appropriate framework for movement throughout the plan area in accordance with the aim of the Framework to maximise sustainable transport solutions?	
i. Are references to uplifts in PTALs realistic given that transport improvements of train services are not committed?	It is not sufficient to rely on uncommitted train services alone to support an uplift in PTAL. Uplifts in PTAL will require improved permeability to enable better access to bus services and the train station from all parts of the site, changes to road network to improve bus penetration of the site, increased bus capacity as well extra train services per hour. There is an upper limit to what PTAL can be achieved from the rail network. PTAL can be improved further by Crossrail 2. Arup as produced a Meridian Water Bus Strategy (14 th July 2017) as part of the evidence base for ELAAP. The Council and their advisors will need to work with TfL to convert the strategy into an operational bus strategy, including funding improvements to the bus network (services and infrastructure) through s106 agreements and other funding sources.
ii. How can the implementation of improved public transport links to and through the plan area be best secured?	As stated above, significant investment will be needed in the bus network prior to the 5,000 homes being delivered, and to deliver 10,000 homes Crossrail 2 is needed. Therefore, we would include the following projects in Table 14.1 - Early bus network for Meridian Water related to emerging Phase 2 proposals - Developer contributions for bus services, this will be needed from early stages to establish bus usage and sustainable travel choices - Meridian Water to Edmonton Green direct bus link - outcome should define bus infrastructure design and how it fits into the wider bus network.
iii. Does the Plan make adequate provision for east west movement by public transport/bus routes through the site? How will this be	Part 1. Yes, in term of infrastructure proposals. Part 2. This will need funding for buses as well as rail infrastructure and services including CR2

supported? Does it recognise the needs of existing occupiers, including bus operators?	<p>Part 3. The future plan does recognise the need for 24 hour bus garage, however, it doesn't identify where it could be located.</p> <p>The Area Action Plan (Para 5.4.19) observes the need to safeguard the bus depot, which is at Towpath Road, in accord with the Mayor's Land for Industry and Transport SPG, however no specific site replacement site is identified. TfL will not agree to the loss of the bus garage and any replacement site will need to be operational before the existing facility could close.</p> <p>TfL (and Arriva's) view is that we need to identify the location at early stage of ELAAP implementation to allow investment in this essential bus infrastructure.</p>
iv. Does the Plan provide for appropriate levels of parking and for the needs of cyclists and pedestrians?	Yes, the Plan will contribute to the Mayor's modal shift objective by restricting car parking supply. TfL strongly supports this aspect of the plan.
v. Does the plan appropriately take account of the potential of CrossRail2?	TfL is in discussion with Enfield Council on this aspect.
vi. Should specific transport projects to deliver public transport improvements be included in Part D of the Plan?	Yes, they should. See earlier comments.
vii. Would the wording proposed in the relevant Plan policies be an effective means of achieving the aims and objectives of the Plan?	TfL input into developing these objectives which range from developing best practice via the Healthy Streets approach, growing the bus network and investment in rail infrastructure such as Stratford – Angel Road (STAR) Project and after the plan period Crossrail 2, which needs to differentiate from four tracking.

I hope this statement can inform the Examination of the ELAAP. If you have any questions in relation to this Statement, please contact Celeste Giusti at celeste.giusti@london.gov.uk

Yours sincerely

Juliemma McLoughlin
Chief Planner

Cc: Joanne McCartney, London Assembly Constituency Members
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL