

Enfield Council's response to Inspector's IN1 Document

29 November 2024 – Document Reference: [E5].

Council's introduction

1. To date the Council has provided four responses to [IN1]. These are dated 30 September [E1], 24 October [E2] and 1 November [E3] and [E4]. All previous responses can be viewed on the Examination library at:
[www.enfield.gov.uk/ data/assets/pdf file/0017/61730/Document-library-Planning.pdf](http://www.enfield.gov.uk/data/assets/pdf_file/0017/61730/Document-library-Planning.pdf)
2. This response [E5] specifically responds to the inspector's remaining Preliminary Questions in relation to:
 - PQ23,
 - PQ26 – PQ34,
 - PQ39 – PQ45,
 - PQ48 – PQ57,
 - PQ59, and
 - PQ 60, PQ61b and PQ62
3. This response [E5] contains 3 Appendices in relation to PQ28, PQ60 and PQ62. In addition, there are two pieces of legal advice in relation to PQ44 and PQ45 appended separately [E5.1 and E5.2], as well as a supporting note in relation to retail [E5.3], which is associated with the response to PQ48.
4. The Inspector's questions are shown below in ***bold italics*** with a border, following any preamble to the question in italics. The Council's responses are shown in normal typeface below the Inspector's questions.
5. Modifications arising from the Inspector's questions (where proposed) are set out in grey tint boxes.
6. The Council further notes that the 'modifications' suggested in response to the Inspector's questions below are not the only ones that the Council has suggested to date. The schedule of suggested modifications [DMOD1] is a live document and has now been formally submitted to the Inspector on 29 November 2024 (as part of PQ23).

Responses to the Inspector's questions

Other documents and evidence

PQ23. Where applicable, could the Council provide a schedule of proposed modifications it considers would be necessary to make the Plan sound?

Council's response:

7. A schedule of proposed modifications is provided under [DMOD1]. The modifications set out in this schedule are predominantly derived from the signed Statements of Common Ground (SoCGs) and the modifications proposed by the Council in responding to the Inspector's Preliminary Questions. They are modifications that Officers consider would be necessary to make the Plan sound.
8. The Council will maintain and update the schedule of proposed modifications as the ELP progresses through the examination process, or through responses provided to the Inspector on previous Preliminary Questions.
9. Please note that in the interest of being helpful, the Council has also prepared a schedule of minor modifications (including typos and grammatical errors). This can be made available to the Inspector upon request.

Other Matters

Vision, Spatial Strategy Key Diagram

PQ26. Other than in regard to Policy SS1, what other policies in the Plan refer or relate to the concept of 'gentle densification'?

Council response:

10. The term 'gentle densification' is used in two places in the ELP [SUB1 and SUB2]. It is used in the key for the Key Diagram, and there is a reference to 'gentle densification' in the explanatory text associated with Policy SS1 (see paragraph 2.24 of the ELP [SUB2]).
11. Policy DE1: Delivering a Well-Designed, High Quality and Resilient Environment, and the associated explanatory text, do not refer to 'gentle densification', but do set the context for the level of change expected throughout the urban area of the Borough (with reference to the Borough's Character of Growth Study [DES1 – DES43]).
12. The ELP, informed by the Character of Growth Study and other evidence base documents, promotes the highest development densities in town centres and other locations served by public transport, and in relative terms, less densification in other parts of the Borough.
13. The Character of Growth Study helps to recognise and establish the character of existing communities in an evidence-led way (in line with NPPF paragraph 130), and through providing clear guidance for plan-making and decision taking around acceptable building heights, volumes and masses within Enfield's urban areas, seeks to optimise development opportunities in the Borough.

14. As set out within paragraph 4.22 of the Exceptional Circumstances Topic Paper [TOP5], the average density of schemes assessed as developable in Enfield's HELAA [HOU1] (excluding extant planning permissions) is 90 dwellings per hectare, representing a significant uplift on existing densities within the Borough.
15. The Council accepts that the term 'gentle densification' could be misinterpreted when considered in isolation. To provide greater clarity, the Council supports the following modifications to the ELP:
 - Key Diagram key:
Replace "Gentle densification areas" with "Contextually appropriate densification areas".
 - Paragraph 2.24:
Amend the third sentence to read:

"The strategy further involves the redevelopment of outdated centres and housing estates, such as Angel Edmonton, intensification at Southbury retail park and sites with single storey supermarkets, as well as small scale developments and ~~gentle~~ contextually appropriate densification in existing residential areas."
16. These modifications aim to ensure the terminology aligns with the ELP's strategic objectives.

Placemaking areas

PQ27. What status are figures 3.2 to 3.14 intended to have? For example, are they intended to form part of the policy?

Council response:

17. The Council clarifies the status of Figures 3.2 to 3.14 in the ELP [SUB2] as follows:
18. Figures 3.11 and 3.13: These are extracts from the Policy Map included for ease of reference. Their status is consistent with that of the wider Policy Map.
19. Figures 3.12: Chase Park Placemaking Area – Illustrative Framework Plan and 3.14: Crews Hill Illustrative Spatial Framework: These figures are explicitly labelled as 'illustrative' and are not intended to form part of the policy. They serve as visual representations of the key principles outlined in Policies PL10 and PL11, such as potential land use distribution and connectivity. Detailed masterplans required under Policies PL10 and PL11 will build upon the conceptual spatial frameworks.
20. Figures 3.2 to 3.9: Placemaking Plans and Vision Plans: These figures are illustrative and not intended to be read as policy. They visually illustrate the broad

relationship between site allocations and the principles set out in the associated placemaking policies. For clarity, the Council propose a modification to the titles for Figure 3.9 – “Palmers Green Placemaking Vision Plan”. This is set out with [DMOD1]. For the avoidance of doubt, the word ‘illustrative’ could be inserted in the title for Figures 3.2 – 3.9.

21. Figure 3.10 Rural Enfield Placemaking Vision: this figure is also illustrative and not intended to be read as policy. The scale of the plan emphasises its role in visually representing the principles within Policy PL9: Rural Enfield.
22. These clarifications ensure that the illustrative figures are appropriately distinguished from policy, aligning their purpose with the ELP’s broader objectives.

PQ28. How are the ‘opportunity areas’ expected to be used in a decision-making context? Where are numbers in the symbols for such things as infill opportunities, new public realm opportunities etc derived from and what relevance do they have to the policies and decision-making?

Council response:

23. The placemaking area frameworks in Figures 3.2 to 3.9 are intended to guide decision-making by coordinating development and infrastructure at a place scale. They provide context for developers and decision-makers, assisting in the prioritisation of developer contributions and infrastructure investment. These frameworks help align individual projects with the broader goals of placemaking and strategic growth.
24. Each placemaking opportunity is assigned a reference number that cross-references with a table providing further details, including the opportunity’s nature and its source, for example an existing plan, strategy or programme. While these tables are not included in the submitted ELP [SUB12], the Council proposes their inclusion as a modification to enhance clarity. These opportunities represent public realm or green infrastructure improvements that offer public benefit, funded either directly or indirectly through S106 or CIL contributions. In some cases, these are specific requirements tied to Site Allocations e.g. new squares or routes and are reflected in site proformas in Appendix C of the ELP. Other opportunities, such as enhancements to Market Square in Enfield Town, align with ongoing Council-led projects.
25. The infill opportunities identified in the frameworks represent sites suitable for small scale residential development. Identifying these opportunities encourages a pipeline of windfall sites that contribute to the densification of placemaking areas, complementing designated Site Allocations.
26. In practice, developers are already using these opportunities to support planning applications, demonstrating their practical value. For example, application reference: 24/03165/FUL for “...Erection of part 4, part 5 and part 6-storey block of

25 x deck accessed self-contained flats...” makes reference to the Council-led project to improve Park Avenue and aligns with the illustrative frameworks to deliver transformational change. This demonstrates how the illustrative frameworks are enabling the realisation of Enfield’s growth and placemaking objectives contained in the ELP policies.

A Vision For Angel Edmonton

Draft Local Plan
Enfield's draft local plan sets out a vision for Angel Edmonton High Street to be revitalised through community-led initiatives, active travel corridors and green infrastructure.

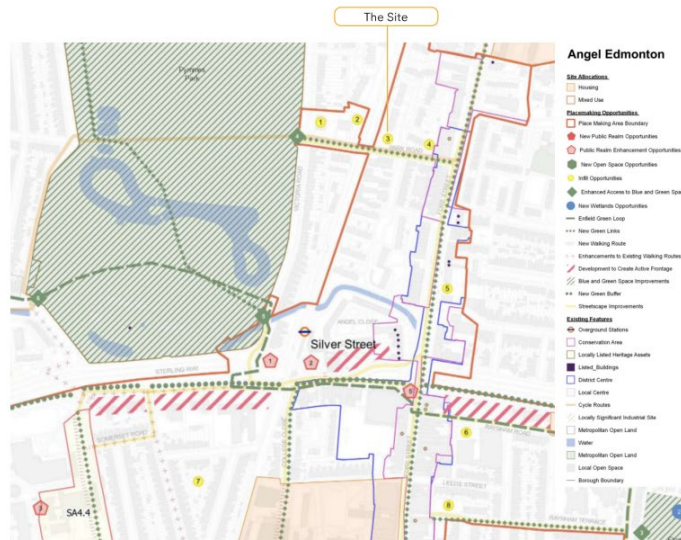
Improvements along Park Road have been identified as an important contributor to this vision, creating a green link between Fore Street and Pymmes Park.

The application site is identified as an infill opportunity along Park Road that can contribute to this vision for regeneration of Angel Edmonton.

Transformative Change
London Plan Policy D1 requires boroughs to undertake an area assessment to define the characteristics, qualities and value of different places within the borough in order to develop an understanding of different areas' capacity for growth.

Enfield's draft local plan allocates the site as part of an area of Transformative Change, supporting development on the site that changes density and urban form of an area.

Fig 1. A map taken from Enfield's draft local plan capturing the council's vision for Angel Edmonton. Fig 2. Map of the site's character allocation taken from the council's evidence base for the draft local plan. It shows the site in an area of transformative change.



2203-RCK-XX-XX-RP-A-00006

Park Road Design and Access Statement

RCKa

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Fig PQ28 (1). Extract from Design and Access Statement for 24/03165/FUL.

27. Each placemaking opportunity shown in Figures 3.2 to 3.9 is assigned a reference number that corresponds to an explanatory table. These tables provide detailed information about the nature of each opportunity and its source i.e. another plan, strategy or programme. The tables have not been included in the ELP but are provided below. The Council proposes, subject to the Inspector’s agreement, a modification to the ELP to include these tables alongside the relevant Figures. This addition would enhance clarity and provide greater context for the policy illustrations, aiding decision makers and stakeholders in understanding the opportunities presented. See sample below.

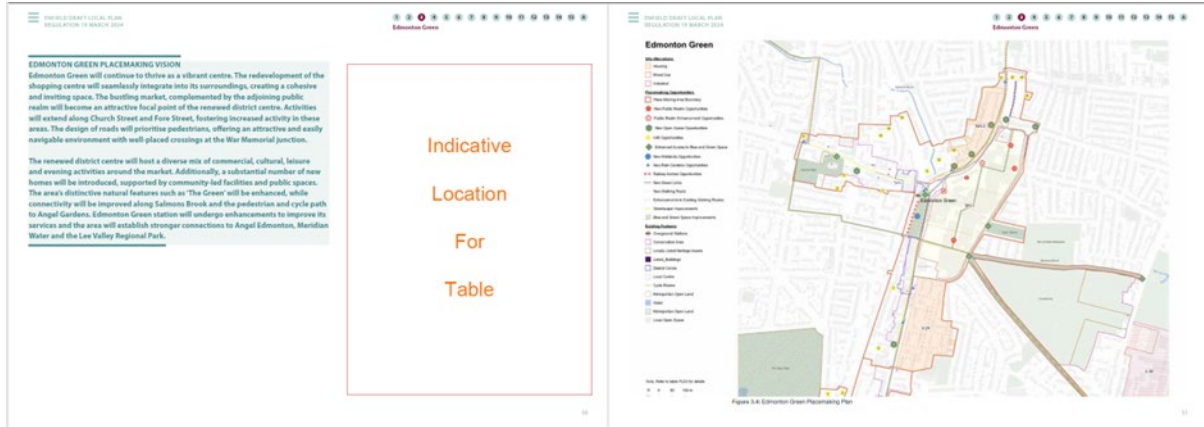


Fig. PQ28 (2) – example of how the tables below could be incorporated into each placemaking area page.

28. Appendix 1 of this response sets out the tables which would act as a key for each relevant figure. These would be subject to reformatting as necessary, to align with the graphic design of the plan.

Rural Enfield and Green Belt

PQ29. Could the Council confirm how much land is proposed to be removed from the Green Belt, both in absolute terms and as a proportion of its existing extent?

Council response:

29. The Council confirms that it proposes the removal of 436.8 hectares of land from the Green Belt via allocated development sites. In absolute terms, this equates to 14.2% of Enfield's current total Green Belt area, which spans 2,630.8 hectares.

PQ30. Could the Council confirm that site RUR.08 – Sloeman's Farm is not being removed from the Green Belt? Is the inset map on page 352 accurate in this regard? What built form is envisaged for this area and has any assessment of whether this would constitute inappropriate development in the Green Belt been carried out?

Council response:

30. The Council confirms that site RUR.08 Solemans Farm is to remain within the Green Belt. The inset map on page 552 (not page 352) is incorrect, and the Council proposes to modify the inset map to ensure consistency with the Policies Map. This correction will be included in the forthcoming modifications schedule [DMOD1].

31. The proposed use for the site to provide additional land for natural burial space. Given the nature of this land use, no assessment of inappropriate development in the Green Belt has been undertaken, as the extent of development would be limited to natural burial space only.
32. The Council is confident that the proposed land use complies with paragraph 154(b) of the NPPF, which supports certain uses in the Green Belt that preserve openness and do not conflict with Green Belt purpose.

PQ31. In relation to Policy CL4 and allocations RUR.06 and RUR.07, could the Council clarify what built form is envisaged as part of any development on these sites and has any assessment of whether this would constitute inappropriate development in the Green Belt been carried out?

Council response:

33. Policy CL4(b) designates sites RUR.06 and RUR.07 for new strategic sport and leisure facilities to address additional needs for sport and recreation during the Plan period. For Policy RUR.06, the proposed land uses, as outlined in Appendix B of the ELP (page 548), include sports, leisure and recreational facilities. This site is expected to accommodate significant built form to support these activities, compatible with the urban character of the adjacent land uses to the west, north and south. Subject to the Inspector's agreement, the Council proposes a modification to clarify the scope of potential development, which will be included in the modifications schedule [DMOD1].
34. For Policy RUR.07, as outlined in Appendix B of the ELP (page 550), the site is intended for a combination of nature recovery, professional sport, recreation and community sports uses. While there is potential for some built development, much of the site will remain undeveloped to support nature recovery, consistent with the rural setting and character of the location.
35. Regarding Green Belt considerations, no formal assessment has been carried out to determine whether the proposed uses would constitute inappropriate development. However, the Council acknowledges that Green Belt policies will apply to these sites. As a matter of principle, the Council considers that the proposed uses have the potential to align with paragraph 154(b) of the NPPF, subject to detailed assessments at the application stage.

PQ32. For the avoidance of doubt, are there any areas identified as 'Rural Enfield', as identified on the key diagram, outside the Green Belt? If not, how does this correlate to figure 3.10 and Policy PL9?

Council response:

36. There are no areas identified as Rural Enfield that lie outside the Green Belt. However, the key diagram currently shows some areas of the Green Belt that are not identified as part of Rural Enfield. This is a drafting error, and the Council proposes a modification to align the Rural Enfield annotation with the Green Belt boundary on the key diagram for consistency.
37. Policy PL9 provides a placemaking framework for parts of the Borough outside the urban area and are not within the specific placemaking areas of Chase Park and Crews Hill. The policy recognises Rural Enfield as a unique and varied place, emphasising its priorities such as landscape restoration, biodiversity enhancement, recreation and other strategic aims. Policy PL9 is further supported by related policies in Chapter 6 (Blue and Green Enfield) and Chapter 11 (Rural Enfield), which collectively underpin the strategic vision for this area.
38. To enhance clarity, the Council proposes a modification to Figure 3.10 to better outline the boundaries of the Rural Enfield placemaking area. It is worth noting that Figure 3.10 also shows features outside of the Rural Enfield policy area, such as rivers and major parks within the urban area. These are included to provide a broader understanding of the Borough's interconnected natural and green networks. If additional clarity is deemed necessary, the Council could include explanatory text to clarify why features outside the Rural Enfield placemaking area are shown Figure 3.10, emphasising their role in the Borough's overall natural network.

PQ33. Are the policies in Chapter 11 – Rural Enfield – meant only to apply within the Green Belt?

Council response:


39. The four policies in Chapter 11 Rural Enfield apply to different areas, as explained within each Policy. They are not exclusively limited to the Green Belt but are tailored to address specific contexts within and around Rural Enfield.
40. Policy RE1: Character of the Green Belt and Open Countryside applies to development within, adjoining, or in close proximity to the Green Belt. The policy aims to protect and enhance the character of the Green Belt and the surrounding areas it influences, extending its scope beyond the Green Belt boundaries.
41. Policy RE2: Improving Access to the Countryside and Green Corridors focuses on enhancing pedestrian and cycling connections to and through the countryside, including green links. This policy applies to proposals in both the Green Belt and urban areas where such connections can be established or improved.
42. Policy RE3: Supporting the Rural Economy is specific to Rural Enfield, which is defined as land designated as Green Belt. It supports rural economic activities within this designation.

43. Policy RE4: Farm Diversification and Rural Employment similarly applies only to Rural Enfield, encompassing the Green Belt areas. It seeks to promote diversification and employment opportunities consistent with rural land use.

PQ34. Are the areas to which Policy PL9 and policies in Chapter 11 apply identified on the Policies Map?

Council response:

44. The area to which Policy PL9 applies is not currently shown on the Policies Map. The Council recognises that including this area would provide clarity and alignment with the amended Key Diagram (refer to the Council's response to PQ32). To ensure consistency and enhance understanding, the Council proposes a modification to update the Policies Map to include the Rural Enfield boundary.
45. Policy PL9 "Rural Enfield" is illustrated in Figure 2.4: Key Diagram using the designated hatch (refer to council response to PQ32). The Council intends to include this area on an updated Policies Map for clarity and consistency.

 **Rural Enfield**
(incorporating rewilding, sports excellence,
forestry, natural burial, eco-tourism,
horticultural education, agriculture and
environmental enhancements)

46. The Policies Map does not provide separate annotations for the Chapter 11 policies. The application of these policies is as follows:
- Policy RE1 applies to areas within, adjoining, or in close proximity to the Green Belt, and its coverage depends on the specific development proposal.
 - Policy RE2 applies across the Borough, where relevant in both urban and rural contexts.
 - Policies RE3 and RE4 are specific to the Rural Enfield area, which will be reflected on the updated Policies Map.

Economy

PQ39. Could the Council provide a brief summary of the context of Policy E12?

Council response:

47. Policy E12 is set within the context of Meridian Water, a well-advanced regeneration scheme, which is a key component of the Upper Lee Valley

Opportunity Area, as designated in the London Plan (2021). This area is identified as a key growth corridor for housing, employment and industrial intensification.

48. The London Plan emphasises that the planning strategy for the Lee Valley 'should ensure that industrial, logistics and commercial uses continue to form part of the overall mix of uses in the area, and that opportunities for intensification of industrial land and co-location of industrial and residential uses are fully explored.' (paragraph 2.1.33). Strategic guidance on Lee Valley Opportunity Area is detailed in London Plan paragraphs 2.1.29 to 2.1.33.
49. Over nearly two decades, the Council has advanced this strategy through significant progress at Meridian Water. This includes assembling land, securing £195m in strategic infrastructure funding, and delivering on Opportunity Area objectives. To optimise the benefits of land assembly, Policy E12 proposes changes to the distribution of Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS).
50. With Meridian Water now in its delivery phase, Policy E12 aims to facilitate the provision of employment floorspace and land that is consistent with the requirements set out in the London Plan to manage the existing stock and, where possible, prevent a net loss of industrial floorspace and capacity. To date, with over 3,000 homes already approved at Meridian West and land assembly continuing at Meridian East/ Hinterlands, Policy E12 facilitates the provision and management of employment floorspace. It aligns with London Plan requirements to protect industrial capacity, avoiding net loss where possible, while enabling redevelopment. Temporary uses, compliant with London Plan Policy HC5, are also being employed to stimulate economic activity during the transition phase.
51. Policy E12 provides a framework for managing industrial land and floorspace in alignment with the London Plan. It seeks to balance the Opportunity Area's objectives of increasing homes and jobs with the industrial policies outlined in the London Plan, particularly Policies E4 and E5, which focus on protecting industrial capacity.

PQ40. Could the Council explain why it is necessary for the Plan or policy to seemingly 'work through' the process of redistributing SIL and LSIS areas? Why is it not sufficient to identify these areas as finally proposed and then consider whether they are sound and legally compliant (including the justification for the redistribution) through the examination process?

Council response:

52. The policy aligns with London Plan Policy E7, which requires that replacement industrial capacity must be delivered prior to releasing Strategic Industrial Land (SIL). This ensures industrial capacity is preserved throughout the redevelopment,

addressing the GLA's requirements and demonstrating how Enfield can effectively secure and manage its stock of industrial land.

53. To achieve this, the Local Plan makes new industrial allocations, ensuring these are established before non-industrial uses are introduced elsewhere. Policy E12 is intended to ensure that industrial capacity – both land and floorspace is maintained as required by London Plan Policy E7, specifically E7(D)(2), which requires replacement industrial floorspace to be completed in advance of any new homes being occupied. The policy framework also emphasises masterplanning commitments (Enfield Local Plan para 9.116) to guide these efforts.
54. The detailed policy framework was developed to manage the complex transition while maintaining industrial capacity, as required by the London Plan. It provides transparency and a structured pathway for redistributing industrial land, ensuring replacement industrial uses are secured in advance of other developments.
55. The Council believes Policy E12 is comprehensively supported by evidence and supporting text (refer to tables 9.3 and 9.4 in the Local Plan). The tables associated with E12, particularly related to baseline and change, may not be necessary. However, to enhance clarity, the Council recognises that Policy E12 could be simplified to focus primarily on the 'future' state of the proposed allocations. References to change and baseline data, already presented in supporting text and tables, could be minimised or removed. This would streamline the policy while maintaining compliance with strategic industrial requirements. If supported, these modifications can be added to the modifications schedule [DMOD1] in due course.
56. Additionally, Table 9.4 contains a typographical error: the figures reflect square metres of floorspace, not hectares. This will be corrected as part of the modifications schedule.

PQ41. What is meant by 'aspirational change' from SIL to LSIS within the policy?

Council response:

57. The term 'aspirational change' from SIL to LSIS within the policy reflects the vision and phased approach for the redevelopment of the area, as outlined in the response to PQ39. This area is currently in transition, with a mix of temporary uses and vacant land that the plan seeks to transform into permanent industrial premises and homes through strategies such as intensification, consolidation, and co-location.
58. The policy aims to gradually shift some areas from core SIL uses to LSIS designations, while integrating new residential development and making alternative SIL provisions elsewhere. This is part of a complex and evolving

process that aims to modernise existing industrial sites, replace poorer-quality stock, and introduce new industrial and residential spaces.

59. The term 'aspirational' acknowledges the long-term nature and complexity of this transformation, which requires balancing redevelopment goals with the practical challenges of transitioning these areas. However, the Council recognises that using the term 'manage' may better reflect the policy's practical implementation and objectives.
60. To enhance clarity and precision, the Council proposes revising the policy wording from 'Aspirational Change' to 'Manage change' from SIL to LSIS. This revision aligns with the policy's intent and implementation framework.

PQ42. What is the intended status of figures 9.3, to 9.6, table 9.4 and the tables in the policy?

Council response:

61. The Council acknowledges a minor drafting error in the second table within Policy E12. The future LSIS figure for Parcel D is incorrectly stated as 14,560 sqm and should be 29,000 sqm.
62. Figures 9.3 to 9.6 are intended to solely illustrate the extent of the four land parcels (A, B, C and D) across Harbet Road SIL. They visually support the implementation of Policy E12 by providing geographic context and do not introduce additional policy beyond what is shown on the Policies Map.
63. The status of each figure is as follows:
 - Figures 9.3 to 9.6: illustrative to support policy. The Council proposes removing references to 'specific guidance' in these figures to avoid misinterpretation.
64. Table 9.4 provides data on floorspace to guide the intensification of land, as detailed in Table 9.3. Together, these tables reflect the London Plan's requirements to retain industrial land while intensifying industrial floorspace. To improve clarity, and with the Inspector's agreement, the Council proposes modifications to Policy E12 and a redraft of the tables to focus on the 'future' position while clarifying their relationship to policy.
65. The figures currently include elements adapted from another document, which could cause confusion by illustrating features not directly relevant to the policy. Nevertheless, the Council believes these figures remain useful for understanding the policy areas without needing to frequently refer to the policies map. With the Inspector's agreement, the Council will provide revised versions of the figures, that focus exclusively on the relevant policy areas.

Climate resilience

PQ43. Have the policies relating to energy efficiency been reviewed in the context of the WMS? If not, are any modifications necessary to ensure consistency with the WMS?

Council response:

66. Yes. Policy SE4: Reducing Energy Demand and Increasing Low Carbon Energy Supply, that sets energy efficiency standards, has been revisited in the context of the 2023 WMS. The Council does not believe that any modifications are needed to ensure consistency with the WMS.
67. The WMS is explicit in allowing planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulation, where there is a “well-reasoned and robustly costed rationale”, that:
- Ensures that development remains viable; and
 - Considers the impact on housing supply and affordability in accordance with the National Planning Policy Framework.
68. The Council's view is that the evidence-base for Policy SE4 (which includes the study Delivering Net Zero [ENV7] and the Enfield Whole Plan Viability Update [VIA1]) supports the Council's decision to set higher standards for new development than required by existing or planned building regulations. The Council is also of the view that Policy SE4 is in general conformity with Policy SI 2 of the London Plan.
69. It is noted that the Royal Borough of Kensington and Chelsea's Local Plan proposes local energy efficiency standards that go beyond current or planned building regulation, and that the approach was found sound by the presiding Inspector in July 2024. The Inspector's Report states with regard to the WMS:
- “167. In December 2023, a Written Ministerial Statement was published on local energy efficiency standards. The Council has concluded [EX51] that this does not have any implications for Policy GB4: Energy and Net Zero Carbon, which is consistent with Policy SI 2 of the LP. I concur with this conclusion.”*
70. The Delivering Net Zero study [ENV7] formed part of the evidence base for the Royal Borough of Kensington and Chelsea's Local Plan.

PQ44. Do any of the policies in the Plan go beyond current or planned building regulations? If so, could the Council direct me to the evidence required by the WMS to justify this (including any viability assessment that has been carried out)?

Council response:

71. Policy SE4: Reducing Energy Demand and Increasing Low Carbon Energy Supply, may be considered to go beyond current or planned building regulations, in its shift to energy-based targets and offsetting.
72. Importantly, however, Policy SE4 is considered to be in general conformity with the London Plan 2021 requirement of achieving net-zero. The GLA have not raised any general conformity concerns in relation to Policy SE4.
73. The Council understands that building regulations are likely to be updated in 2025 and given the anticipated timeline for examination and adoption of the ELP, the Council wants to ensure that the Local Plan policies in relation to achieving net zero are forward-looking and robust. This is especially important given the scale of new housing proposed to be delivered by the ELP.
74. The rationale for the approach taken in Policy SE4 is supported by the Delivering Net Zero Study [ENV7]. Enfield Council was one of 18 London Boroughs that commissioned this Study, which provides a technical evidence base to inform the policy making process in relation to energy and carbon planning policy. The Council has pursued Policy Option 2 as described in the Study, taking into account the policy recommendations at section 11.2. The detailed energy and cost modelling included in the Study help evidence the feasibility of the approach taken in ELP Policy SE4. In terms of viability (and impact on housing delivery and affordability), the Enfield Whole Plan Viability Update [VIA1] takes into account the development costs associated with the ELP approach to net zero carbon. Paragraphs 8.65 to 8.76 of the Viability Update provide commentary on the Building Regulations, the London Plan approach and the Delivering Net Zero Study.
75. Whilst the Delivering Net Zero Study and Viability Update recognise the extra costs associated with delivering development in accordance with the ELP approach (over and above 2021 Part L of the Building Regulations), the Viability Update notes:
 - As higher standards become the norm, the costs associated with them are likely to fall (as they did following the upgrading of Building Regulations in 2013). This cannot be quantified at this stage, so the current cost estimates are used.
 - Building to higher standards that result in lower running costs does result in higher sales values. The report Buying into the Green Homes Revolution (Santander, October 2022) suggests that house buyers willing to pay almost 10 per cent more for energy efficient properties, and research from Legal & General research shows buyers will pay up to a 20% premium for low carbon homes.

- Whilst not possible to accurately attribute specific values to higher environmental standards, there is anecdotal evidence that higher environmental standards are frequently viewed by purchasers as a positive draw, not least because of lower energy bills.
76. Importantly, with regard to the above, the Viability Update includes no premium (in terms of sales values) for dwellings delivered to higher environmental standards, even though such a premium, on the evidence available, would be justified.
77. Table 12.5 of the Viability Update, entitled “Policy Scenarios for Policy Testing” (page 196), sets out the mid-requirements used to demonstrate the viability of the ELP net-zero carbon requirements. The appraisal results are summarised between pages 197 and 199 of the Viability Update, with the conclusions presented on page 200.
78. It is acknowledged that in lower value areas there are significant viability challenges in Enfield, however, this is not specifically as a result of the proposed approach to net-zero set out in ELP Policy SE4.
79. It is also considered pertinent to refer to the open legal advice obtained by the consultants that prepared the Delivering Net Zero Study. A copy of the open legal advice (delivered by Estelle Dehon KC on 20th September 2024), is appended to this PQ response [reference E5.1]. It advises (paragraph 4) that:

“Neither section 1(2) of the Planning and Energy Act 2008 (“PEA 2008”) nor the 2023 WMS prevents local planning authorities from bringing forward policies modelled on either Policy Option 1 or Policy Option 2, nor do they prevent Inspectors from finding such policies to be sound.”

PQ45. Are requirements that are expressed as Energy Use Intensity consistent with the WMS?

Council response:

80. The WMS suggests that any additional requirements that go beyond current or planned building regulation should be expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER), calculated using a specified version of the Standard Assessment Procedure (SAP).
81. Whilst this is not the approach taken in ELP Policy SE4, the alternative approach taken is considered justified, with many other Local Plans having taken an alternative approach to that set out in the WMS. Further, there is an open legal opinion which states that the 2023 WMS does not prevent Local Planning Authorities from bringing forward policies based on Energy Use Intensity, and nor does the 2023 WMS prevent Inspectors from finding such policies to be sound.

82. The open legal advice received by Essex County Council (appended to this PQ response – reference [E5.2]), paragraph 78, advises that “...the 2023 WMS cannot be interpreted to prevent LPAs putting forward, and planning inspectors from finding sound, policies which are justified and evidenced and which use metrics other than the TER metric and/ or do not require calculation by SAP”.
83. The same legal advice also points to a number of LPAs (Local Plans) that have used metrics other than TER (including Energy Use Intensity). Multiple Inspectors have found the approaches to be justified, and sound in light of the evidence base, taking into account housing delivery (see paragraph 78 of the legal advice received by Essex County Council). The referenced Local Plans are Central Lincolnshire Local Plan Review, Bath and North East Somerset (Core Strategy and Placemaking Plan) Partial Update, and the Cornwall Climate Emergency DPD.
84. Part of the reasoning for using EUI as opposed to TER, is that TER is a metric used under the Building Regulations to deal with conservation of fuel and power, and is essentially a carbon metric, rather than an energy efficiency metric. A percentage uplift of a dwelling's TER may in fact be achieved with a poor level of energy efficiency. The improvement of a building against the TER does not consider the impact of the design of the dwelling (i.e. the building form), which is a key factor in energy efficiency.
85. Overall, the Council believes that the 2023 WMS does not prevent policy requirements being expressed as Energy Use Intensity, there are sound reasons for using this metric (in preference to TER) and the use of alternatives to the TER has been found sound by Inspectors examining other Local Plans.

Retail and Leisure

PQ48. Are the policies in the Plan relating to retail and leisure needs based on up-to-date evidence?

Council response:

86. Yes, the related policies are considered to be based on up-to date evidence. The evidence on retail and leisure needs is the 'Enfield Retail and Leisure Study Updated Needs Assessment,' [TOW2] prepared by Lichfields, published in December 2021.
87. Reflecting the age of the evidence, and the fact that the previous report was published in the end of the Covid period, the Council has asked Lichfields to briefly update their analysis and confirm that their 2021 recommendations remain robust. The Council also asked them to consider retail need in light of the final number of homes now in the ELP.
88. The Lichfields' briefing note (dated 28 November 2024) [E5.3] is appended to this response. In summary, the weaker retail outlook, with slightly lower retail growth

rates compared to 2021, make very little quantitative difference because the weakening retail growth expectations are largely offset by the increase in population we expect to arise from housing growth.

89. Reflecting the proposed housing growth in the Enfield Local Plan, and newer Experian data, the need for comparison floorspace reduces from -3,557 sqm to -10,009 sqm, and food/beverage increases from +5,869 sqm to +7,884 sqm over the plan period.
90. Such a small quantitative change between 2021 and 2024 does not, in the opinion of Lichfield's, vary their recommendations or conclusions.
91. Lichfields have considered the impact of the Ikea site – a loss that was not foreseen in the 2021 study – but conclude that this loss confirmed their view that the comparison market was oversupplied at the time. While the loss of 30,000 sqm may appear significant, the impact of this loss on Enfield is considered minor due to the regional market that the store served and its very low floorspace trading density compared to more conventional comparison floorspace.

PQ49. Is the most recent assessment of need for retail or leisure floorspace consistent with the proposed housing requirement?

Council response:

92. Lichfields have confirmed that the quantum of retail need set out in their 2021 study is broadly aligned with the proposed number of homes in the plan. Please see the council's response to PQ48.

PQ50. To what extent have the allocations, particularly those involving existing retail, been taken into account in identifying future retail needs?

Council response:

93. The 2021 Lichfields report underpins the approach taken to site allocations in the ELP. Given the limited retail need identified, most retail related allocations focus on the re-provision of existing space where redevelopment is proposed, including:
 - SA1.1: Palace Gardens Shopping Centre, Enfield: requires provision of non-residential uses.
 - SA1.3: Tesco, Southbury Road: anticipates re-provision of the existing supermarket, and requires re-provision of non-residential uses.
 - SA2.3: Morrisons, Southbury Road: anticipates re-provision of the existing supermarket, and requires re-provision of non-residential uses.

- SA2.4: Southbury Leisure Park: requires re-provision of non-residential uses.
 - SA2.5: Tesco, Ponders End: anticipates re-provision of the existing supermarket, and requires re-provision of non-residential uses.
 - SA2.6: Sainsbury's, Crown Road: anticipates re-provision of the existing supermarket, and requires re-provision of non-residential uses.
 - SA5.4: Tesco Extra, Meridian Water: requires re-provision of existing non-residential uses.
 - SA7.2: Aldi, New Southgate (Formerly Homebase): requires the re-provision of non-residential uses.
 - SA8.1: Morrisons, Palmers Green: anticipates re-provision of the supermarket with 6,000 sqm of Class E floorspace.
 - SA8.3: Corner of Green Lanes and the North Circular: requires re-provision of existing retail food store.
 - SA8.4: Travis Perkins, Palmers Green: requires re-provision of existing builders' merchant.
 - SA URB.07: Sainsbury's Green Lanes: anticipates re-provision of the existing supermarket, and requires re-provision of non-residential uses.
 - SA URB.18: Land at Ritz Parade: requires re-provision of some non-residential floorspace.
94. Based on Lichfields' advice, the plan also accommodates three instances of comparison retail losses (excluding Ikea, for reasons set out in our response to PQ48):
- Colosseum Retail Park: explicitly considered in the 2021 retail study, which supported the loss of 10, 212 sqm of comparison retail floorspace.
 - Ravenside Retail Park: contains 12,500 sqm of existing retail floorspace. While not explicitly addressed in the study, the ELP's approach aligns with its guidance (para 4.8) to consider releases where an economic/employment case can be made.
 - Edmonton Green Shopping Centre: reflects a reduction of 8,000 sqm following the grant of planning consent (ref: 20/04187/OUT), where full replacement was deemed unviable.
95. The loss at the Edmonton Green Shopping Centre was a pragmatic decision that reflected the ability (viability) to seek full replacement. Through the decision-making process this loss was accepted and the allocation reflects this loss.

96. However, the plan makes modest positive provision to address any shortfall towards the back of the plan period at Crews Hill, Chase Park, and Meridian Water. These locations are identified as main placemaking areas in the Enfield Local Plan (Policy SS1), and will experience significant increases in resident population up to 2041 and beyond. Retail capacity at these locations is not quantified given that delivery is not expected until later in the plan period, but capacity is available via these allocations to address any quantitative shortfall should it be necessary.
97. In summary, the allocations in the plan seek to balance Enfield's retail stock in line with the recommendations from the evidence base. Since that was commissioned a further loss at Ravenside has been promoted and accepted by the LPA because it directly aligns with the evidence base advice. The Council has pragmatically accepted an additional loss at Edmonton Green as part the shopping centre redevelopment.
98. The plan has capacity to address some of this shortfall as part of the new town centre at Meridian Water and the emerging centres at Crews Hill and Chase Park, although the plan does not currently qualify this given the long term nature these significant interventions.
99. Given the projected decline in comparison floorspace it seems other proposals to redevelop and repurpose other retail parks are likely to emerge in the future. As an alternative to comparison retail use, these locations provide scope to sustainably meet employment and housing needs, without creating an under-supply of comparison goods retail floorspace in the Borough.' (para 4.8 of Lichfields 2021 LBE study). This is the approach the Enfield Local Plan has adopted at Ravenside (SA5.8).
100. The 'Enfield Town Centre Healthchecks and Boundary Reviews' report (2021) [TOW1] observed that 'Some of the centre's larger units are occupied by multiple comparison goods retailers that may be 'right-sizing' and evaluating their future store requirements.' These observations align with proposals for comprehensive redevelopment of the shopping centre, consented in 2022. The LPA sought to limit losses of retail floorspace, with the replacement 34,000sqm as the maximum quantum viable and deliverable as part of a new mixed use redevelopment that includes a significant amount housing (1,438 dwellings over the plan period). As there is 42,000 sqm of retail floorspace currently, the replacement quantum results in a net loss of c.8,000 sqm. While this loss in addition to what was considered by Lichfields, the LPA has accepted that, on viability grounds, full replacement of the comparison floorspace is not pragmatic.

PQ51. Does the Plan identify primary shopping areas as expected by the PPG?

Council response:

101. The Planning Practice Guidance (PPG) specifies that 'Planning policies are expected to define the extent of primary shopping areas.' While this guidance remains relevant, it was last updated in July 2019, prior to significant changes to the Use Classes Order in September 2020m which introduced, including Class E to merge retail and other main town centre uses.
102. The Lichfields' 'Enfield Retail and Leisure Study Updated Needs Assessment' [TOW2] highlights that the traditional approach to designating Primary Shopping Areas is has become less relevant due to the merging of retail and with many other main town centre uses into the new Class E. Nevertheless, in the current NPPF (December 2023), retains the requirement for planning policies to define the extent of Primary Shopping Areas (para 90).
103. In light of the PPG and NPPF, the Enfield Local Plan treats the major and district town centre boundaries as the primary shopping areas. This approach reflects the integration of retail and other uses within Class E while aligning with national policy requirements.
104. To ensure full compliance, the Council proposes a modification to Table 10.1, clarifying that for Enfield Town, the Primary Shopping Area is the same as the boundary of the town centre. This adjustment aligns the ELP with the requirements of the PPG and NPPF while considering the evolving nature of town centre uses under Class E.

Biodiversity

PQ52. What implications does the PPG have, if any, for policies in the Plan relating to biodiversity net gain?

Council response:

105. The biodiversity net gain (BNG) policies in the plan align with the government's longstanding ambition to implement BNG from 2024. The Council considered the draft PPG on BNG, published in December 2023, when preparing for the Regulation 19 consultation in March 2024, ensuring the policies were consistent with emerging guidance.
106. The PPG states that Plan-makers must align with the statutory framework for BNG outlined in NPPF Paragraph 185, identifying measurable gains without duplicating existing regulations or including exempt categories of developments. While local biodiversity initiatives are encouraged, the PPG advises that targets exceeding the statutory minimum of 10% must be justified. It also highlights the importance of effective monitoring, enforcement and long-term maintenance of biodiversity enhancements.
107. Policy BG4: Biodiversity Net Gain, Landscape Restoration and Offsetting seeks a BNG target higher than the statutory 10% aiming for 20% subject to viability. This

approach is justified, as detailed in the Council's responses to PQ53 and PQ54 and aligns with the PPG, by avoiding duplication of statutory provisions adhering to the government's biodiversity metric, and excluding exempt development categories.

108. In line with the PPG, Policy BG4 supports local offsite biodiversity initiatives, including the Enfield Chase Landscape Recovery Strategy. This approach is complemented by Policy BG7 which focuses on on-site biodiversity enhancements and Policy PL9 which emphasises Rural Enfield's role in supporting offsite biodiversity initiatives and integrating biodiversity improvements into development sites.

PQ53. Where in the evidence is the justification required by the PPG for the 20% biodiversity net gain advocated by Policy BG4, and others?

Council response:

109. The PPG states "To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development." The Council has considered this guidance and provides the following response.

Local need

110. Enfield was selected by DEFRA in September 2022 through a competitive process to participate in the pilot Landscape Recovery Scheme, a new form of environmental land management scheme designed to restore nature and boost biodiversity. The scheme will cover the Northern part of Enfield Chase in the Green Belt and is the only such area designated within Greater London. Applicants were assessed against selection criteria which considered their feasibility, costs and environmental and social benefits by a panel of subject matter experts. Historically, the rural area of Enfield comprised a landscape of woodland, meadows and wild rivers. However, trees have since been felled and rivers straightened and dredged, so now only a few fragments of this historic landscape remain. The negative impact of this loss on biodiversity in the area is significant - soil has been degraded and wildlife habitats destroyed, leading to a huge loss of biodiversity. Work is currently ongoing to establish a habitat baseline for these areas as part of the Enfield Chase Landscape Recovery Project. The selection of the area by Defra recognises the deficit in biodiversity compared with the area's potential for habitat restoration.
111. The Blue and Green Strategy (FLD3) sets out on page 63 that just 30% of publicly owned SINCs in the borough are under active conservation management given long term budget pressures and sets a target to increase this to 100%. The proposed 20% net gain policy in Enfield could help to contribute to active conservation management of these existing habitats sites, as well as contributing

to the wider Enfield Chase Landscape Recovery project. It has a critical role to play in delivering these much-needed conditions uplifts set on both designated and non-designated sites, and in particular within the Landscape Recovery Area, which is designated as having High Strategic Significance within the BNG metric by Policy PL9: Rural Enfield. The Council intends to update the Blue and Green Strategy in 2025 to establish the full scale of biodiversity credits available on Council-owned sites and those needed to improve their condition.

The opportunity

112. This local opportunity for high intensity biodiversity net gain is recognised through a long-term legal agreement involving partnership organisations under the oversight of Natural England and the Environment Agency. The scheme's duration will be at least 20 years, extending beyond the plan period. According to DEFRA, landscape Recovery projects will yield a range of outcomes, with a primary focus on achieving net zero emissions, biodiversity enhancement, and water quality improvement. By reinstating natural processes through the conversion of farmland into woodlands, meadows, wetlands, coupled with enhanced public access and sustainable commercial activities, these projects offer significant public benefits based on a blended funding model with the potential to offer BNG credits where relevant. In particular, there is high potential for riparian and watercourse habitat restoration with very high BNG values in comparison to non-riparian habitats that might be impacted in the development process across Enfield.
113. The Council is willing to provide a summary paper on the ongoing work of the Landscape Recovery team at Enfield Council together with DEFRA and, subject to necessary approvals, the legal agreements underpinning this work programme. Additionally, the council is open to consider modifications to the explanatory text of Policy BG4 to clarify the scale of the opportunity and the necessity for development in Enfield to support this initiative where feasible.
114. Further details on viability testing are addressed in the Council's response to PQ54.

PQ54. Could the Council confirm, by reference to specific paragraphs, tables or conclusions, that the requirement of 20% biodiversity net gain has been assessed as part of the WPVA?

Council response:

115. Table 12.5 Policy Scenarios for Policy Testing (Page 196) sets out the mid-requirements used to demonstrate the viability of the 20% net gain scenario alongside zero carbon requirements. The appraisal results are summarised between pages 197 and 199 with conclusions on page 200. This sets out clearly that the impact of BNG on viability is limited, alongside other sustainability measures. It is recognised that in lower value areas there are significant viability

challenges in Enfield, however the tests on page 196 show this is not specifically as a result of the 20% BNG requirement in the plan. Furthermore, in many cases, previously developed sites, where they do not contain vacant urban mosaic habitats, are unlikely to have high net gain requirements, and the cost associated with this is likely to be limited. Where there are specific viability concerns, as with any plan policy, the policy would be applied subject to viability.

Delivery and Monitoring

PQ55. What is the purpose of Policy D1 referring to payments needing to be made under various infrastructure levies? Are these outside the scope of the Plan?

Council response:

116. The aim of this Policy was to manage the way in which payment levies from development were managed over the plan period. This provided a mechanism to both secure monies from development and to distribute this towards supporting infrastructure and services aimed at mitigating the effects of new development.
117. However, on reflection, the Council agrees that the mechanism for payment levies is outside the scope of the Plan and Policy D1 is not necessary for soundness. Therefore, a policy for this is now not required and the Plan should be modified to remove Policy D4. The Explanatory text should be reworded to provide explanatory text in relation to the role of CIL payments and developer contributions in mitigating the impact of development. This will be added to the modifications schedule [DMOD1] in due course.

PQ56. Could the Council explain the purpose of Figure 15.1 and how this would be used in a decision-making context, particularly given the circumstances in which planning obligations can be sought and the provisions of parts 2, 3 and 5 of Policy D1?

Council response:

118. The aim of Figure 15.1 was to set out the Council's priorities in terms of infrastructure/environmental provision and then aim to allocate monies from development levies towards improving these issues within priority order. This identifies affordable housing as a key priority to help meet the expected need for affordable housing over the Plan period.
119. However, on reflection, the Council believes there is a lack of clarity on how this table could be used in a decision-making context given the other requirements around section 106 contributions and Community Infrastructure Levy payments.

120. Therefore, the Council proposes to delete Policy D1 and as a consequence of this deletion, Figure 15 should also be deleted from the Plan via modification. This will be set out within the forthcoming modifications schedule [DMOD1].

PQ57. What is the purpose of Policy D4 in a development management context?

Council response:

121. On reflection, the Council concludes that Policy D4 is not necessary for soundness. However, the wider explanatory text on page 346 of the submitted Local Plan remains important in order to clarify how the Council intends to monitor the impact of the Plan over the Plan period. Therefore, the Council proposes to modify the Plan by deleting Policy D4 and reword this section of the Plan to provide explanatory text in relation to the wider Monitoring Framework. This will be added to the modifications schedule [DMOD1] in due course.

Appendices

PQ59. What is the intended status of Appendix D? Are the maps and associated text meant to be read as policy?

Council response:

122. Policy DE6: Tall Buildings, cross references to ELP Appendix D. The maps and associated text at Appendix D are intended to be read as policy.
123. The editorial decision was made to display the tall building maps and associated text at a smaller scale so that each areas height, context, boundaries and sensitives could be fully understood. The approach was informed by comments received at the Regulation 18 stage, stating that the Tall Buildings map was difficult to decipher and confusing.
124. For clarity and consistency, the Council propose a modification to Policy DE6: Tall Buildings, paragraph 1, as follows:

“For the vast majority of the Borough, the definition of a tall building is any part of the building (including roof plant) at 21 metres or above. Where the local context warrants a departure from this definition, these areas are spatially identified in Figure 7.3 and associated inset maps set out in Appendix D. The inset maps and associated text at Appendix D carry the status of policy. If a proposal is defined as tall, it will be assessed against the criteria in this policy. It is important to note that building heights below the definition of “tall” are not necessarily acceptable and are subject to assessment against all other policies in the development plan, including consideration of appropriate scale (e.g. DE1).”

125. For clarity and consistency, the Council propose a modification to Policy DE6: Tall Buildings, paragraph 2, as follows:

“Figure 7.4 and associated inset maps set out in Appendix D identifies-identify areas where tall buildings (i.e. above the local definition) are acceptable in principle. Tall buildings should only be developed in these areas. The inset maps and associated text at Appendix D carry the status of policy.”

126. Since the publication of the Regulation 19 plan for pre-publication in December 2023 and full consultation in 2024, the maps, heights and text in Appendix D have been referred to by developers as draft policy and used to form pre-application proposals. Furthermore, the wording, boundaries and heights proposed have been the subject of debate at planning committee in determination of applications that propose tall buildings. This demonstrates that this policy has been well received and understood by the development community and is helping to positively shape and plan development in Enfield.

PQ60. What is the intended status and purpose of Appendix E? What are the implications of including precise financial contributions within the Plan? How would changes, such as inflation, be taken into account?

Council response:

127. Appendix E is intended to provide an overview of the developer contributions that may be sought, with an explanation of how the contributions will be calculated.

128. Upon reflection, the Council recognises that, whilst well intended, the Appendix may become quickly outdated following adoption of the Enfield Local Plan (ELP). The Council can also see that Appendix E could be incorrectly interpreted as an exhaustive list of potential developer contribution requirements. In reality, other contributions will be needed on many schemes to make the development acceptable in planning terms.

129. The Council proposes deletion of Appendix E.

130. The ELP explanatory text at paragraph 15.7 confirms the Council's intention to update the existing Developer Contributions Supplementary Planning Document. The Council will prioritise this work, to assist applicants preparing development proposals under the new ELP.

131. The Council notes that in relation to some of the developer contributions referenced in Appendix E, there are figures and principles that could usefully be included in the explanatory text of the ELP. So, for example, currently, in relation to contributions in lieu of on-site affordable housing provision, only Appendix E refers to the need for the contributions to take into account the costs of land, building and servicing.

132. The schedule in Appendix 2 of this response sets out the modifications proposed by the Council, arising from the proposed deletion of Appendix E. These changes simply move relevant text from Appendix E into the explanatory text associated with the relevant policies, and on this basis, do not alter the substance of the Plan.

Policy Interpretation

PQ61b.

For the avoidance of doubt, and to assist in discussions at a later date:

b) Could the Council consider whether citing examples in policies is likely to be clear and unambiguous for decision makers and whether these would be better placed in the reasoned justification, perhaps with other examples where appropriate? If, in the alternative, the examples are meant to define the full scope of where a policy may apply, then would modifications be necessary to make this clear?

Council response:

133. The Council notes that the London Plan makes use of the word “example” in a number of its policies (see Policies GG3 – Creating a Healthy City, SD5 – Offices, other Strategic Functions and Residential Development in the CAZ, SD7 – Towns Centres, D1 – London’s Form, Character and Capacity for Growth, G7 – Trees and Woodlands, SI 13 – Sustainable Drainage and T6.3 – Retail Parking).
134. Similarly, adopted London Borough Local Plans make use of the word “example” in their policies.
135. In general terms, the Council believes that a decision taker will understand that where examples are provided within a policy, and a planning application includes those measures (to an acceptable standard) the application can be considered to be in accordance with that element of the policy. Importantly, decision takers will also recognise that where an example is referenced, it is just that, an example. The policy does not preclude the use of other measures to meet the policy requirement.
136. That said, the Council acknowledges that the terms “for example” and “e.g.” are used extensively in the ELP policies, and to respond to PQ61b), the Council has conducted a preliminary review of the relevant policies. The policies that use the terms “for example” and “e.g.” are as follows:
- PL5 – Meridian Water (paras 10 and 15)
 - PL9 – Rural Enfield (para 2d)
 - PL11 – Crews Hill (para 17m)

- SE1 – Responding to the climate emergency (para 6)
- SE2 – Sustainable design and construction (para 1)
- SE4 - Reducing energy demand and increasing low carbon energy supply (paras 5 and 6)
- SE5 – Renewable energy development (paras 1b and 1e)
- SE6 – Climate change adaptation and managing heat risk (paras 2a and 2b)
- SE7 – Managing flood risk (para 4f)
- SE9 – Sustainable drainage systems (para 5)
- SC2 – Protecting and enhancing social and community infrastructure (para 3d)
- BG1 – Blue and green infrastructure network (paras 1e and 2g)
- BG2 – Protecting nature conservation sites (para 2)
- BG7 – Enhancing the beneficial uses of the Green Belt and Metropolitan Open Land (para 7)
- BG8 – Protecting open space (paras 1a and 3)
- BG9 – Watercourses (para 3)
- BG10 – Urban greening and biophilic principles (paras 1, 2a, 2b and 3c)
- BG11 – Allotments and community food production (paras 3 and 4)
- DE2 – Design process and design review panel (paras 5a and 5c)
- DE6 – Tall buildings (paras 1, 5 and 11h)
- DE7 – Creating liveable, inclusive and quality public realm (paras 3c, 4a, 4d, 4e and 4h)
- DE8 – Design of business premises (paras 1i, 2b, 2c and 3)
- DE11 – Landscape design (paras 2 and 3b)
- DE12 – Civic and public developments (paras 1c and 1d)
- DE13 – Housing standards and design (para 1k, second bullet, and paras 2 and 3)
- DE15 – Residential Extensions (para 5aii)

- H4 – Small sites and smaller housing development (paras 2a and 5)
- D1 – Securing contributions to mitigate the impact of development (Figure 15.1)

137. The examples provided within the ELP policies are generally intended to help the reader better understand the nature of the policy requirement. The examples are not meant to define the full scope of where a policy may apply, and nor are they intended to provide an applicant with an exhaustive list of how and where the policy requirements can be addressed.
138. The Council considers that in many cases the examples cited are clear and unambiguous. So, for example - in Policy DE7 (para 3c), proposals affecting the public realm must take opportunities to improve biodiversity. There are lots of ways in which this might be achieved, with the policy wording citing two examples, but then also going on to refer to the scope for use of “other biophilic interventions”.
139. There are some references to examples, which are effectively setting out matters which must be considered as a minimum. So, for example, Policy SE6 (para a) states that applicants “will be expected to demonstrate how passive measures have been optimised from the outset to reduce overheating risk (e.g. form, orientation, glazing ratio).” The wording of this paragraph could be tweaked to state that applicants “will be expected to demonstrate how passive measures have been optimised from the outset to reduce overheating risk, including in terms of ~~(e.g. form, orientation and glazing ratio).~~”
140. In some instances, it may be that the policy wording could be tweaked, to make the nature of the policy requirement clearer, potentially removing the need to provide any examples. So, for example – Policy PL5 (para 10) states that development proposals “should deliver new open spaces on either side of the North Circular Road (A406), A1055 and roadside improvements (e.g. underpass treatment and bridges)”. This could be amended to read - “should deliver new open spaces on either side of the North Circular Road (A406), A1055 and roadside connectivity improvements, (e.g. including in terms of improved underpasses and bridges).”
141. There are instances where “e.g.” has been used incorrectly. In Policy H4, para 2a, it is stated that housing development and intensification on small sites will be particularly supported in the following locations – “a) sites with good public transport accessibility (e.g. PTAL 3-6)”. The “e.g.” should be an “i.e.”.
142. There will also be instances where the examples referenced in the policies could be pulled through into the supporting explanatory text, although this may not work in all instances, or at least it will not work without significantly increasing the length of the explanatory text (to be clear how the examples relate to a particular reference in the Policy).

143. With the Inspector's agreement, the Council will review each ELP policy that uses the term "example" (or "e.g.") and determine whether in each case the reference is felt to be clear and unambiguous for decision makers. Then, as necessary, the Council will propose modifications, either to amend the policy wording, or to move the examples to the explanatory text.

PQ62. Could the Council identify all parts of policies in the Plan that refer to other documents (that are not development plan documents) and consider whether it is necessary to refer to each and, if so, whether the reference is appropriately phrased?

Council response:

144. The Council has reviewed the ELP policies and prepared a schedule that identifies all parts of policies that refer to other documents (that are not development plan documents). This schedule can be viewed in Appendix 3 of this response. The final column of the schedule sets out the Council's view on whether it is necessary to refer to these other documents, and whether the reference is appropriately phrased.
145. In relation to some policies, the review has led the Council to propose Modifications. The proposed wording for these Modifications is set out in the schedule below and will also be set out in the draft Modifications schedule. The Council does not consider that these changes alter the substance of the ELP.

Appendix 1: PQ28 – Tables which would act as a key for each relevant figure.

Please note that these would be subject to reformatting as necessary, to align with the graphic design of the plan.

PL01 ENFIELD TOWN

REF	DETAILS	NOTES
NEW PUBLIC REALM OPPORTUNITIES		
1	New square delivered though development	See SA1.1
2	New square delivered though development	See SA1.1
3	New square delivered though development	See SA1.4
4	New square delivered though development	See SA1.2
5	New square delivered though development	See SA1.3
6	New square delivered though development	See SA1.3
7	New square delivered though development	See SA1.1
8	New square delivered though development	See SA1.1
PUBLIC REALM ENHANCEMENT OPPORTUNITIES		

1	Town Park Entrance	See Journeys and Places Enfield Town project
2	Little Park Gardens	See Journeys and Places Enfield Town project
3	Fountain Island	See Journeys and Places Enfield Town project
4	Dugdale Centre	See Journeys and Places Enfield Town project
5	Town Square and Churchyard	See Journeys and Places Enfield Town project
6	Enfield Chase Station	See Journeys and Places Enfield Town project

INFILL OPPORTUNITIES

1	Sydney Road Car Park	Opportunity for small scale residential development
2	Little Park Gardens Bus Station	Opportunity for small scale residential development
3	Gladbeck Way Carpark 01	Opportunity for small scale residential development
4	Enfield Town Club Car Park	Opportunity for small scale residential development
5	Gladbeck Way Carpark 02	Opportunity for small scale residential development
6	Little Park Gardens Car Park	Opportunity for small scale residential development

7	Genotin Road Corner	Opportunity for small scale residential development
8	Portcullis Lodge Road Car Park	Opportunity for small scale residential development
9	Genotin Road Car Park	Opportunity for small scale residential development
10	Old Courthouse	Opportunity for small scale residential development

ENHANCED ACCESS TO BLUE AND GREEN SPACE

1	Improved access to New River Walk	See Enfield Blue and Green Strategy
2	Improved access to New River Walk	See Enfield Blue and Green Strategy
3	Improved access to New River Walk	See Enfield Blue and Green Strategy
4	Improved access to New River Walk	See Enfield Blue and Green Strategy

NEW WETLANDS OPPORTUNITIES

1	Enfield County School	See Enfield Blue and Green Strategy
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NEW RAINGARDEN OPPORTUNITIES

1	Enfield Town Station Public Realm Rain Gardens	See Enfield Blue and Green Strategy
2	River Front Swales	See Enfield Blue and Green Strategy

PL02 SOUTHBURY

REF	DETAILS	NOTES
NEW PUBLIC REALM OPPORTUNITIES		
1	New square delivered through development	See SA2.3
2	New square delivered through development	See SA2.1
3	New square delivered through development	See SA2.1
4	New square delivered through development	See SA2.6
5	New square delivered through development	See SA2.5
6	New square delivered through development	See SA2.4
7	New square delivered through development	See SA2.4
8	New square delivered through development	See SA2.5
9	New square delivered through development	See SA2.3
10	New Station Fore Court	See SA2.2
NEW OPEN SPACE OPPORTUNITIES		
1	New Green Space	See SA.23
2	Improved green space adjacent Ripault's Building	
3	New Green Space	See SA2.4

4	New Green Space	See SA2.5
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INFILL OPPORTUNITIES

1	Glyn Road Car Park	Opportunity for small scale residential development
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ENHANCED ACCESS TO BLUE AND GREEN SPACE

1	Improved entrance to Enfield Playing Fields	See Enfield Blue and Green Strategy
2	Improved entrance to Enfield Playing Fields	See Enfield Blue and Green Strategy
3	Improved entrance to Enfield Playing Fields	See Enfield Blue and Green Strategy
4	Improved entrance to Enfield Playing Fields	See Enfield Blue and Green Strategy
5	Improved entrance to Enfield Playing Fields	See Enfield Blue and Green Strategy

PL03 EDMONTON GREEN

REF DETAILS

NOTES

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NEW PUBLIC REALM OPPORTUNITIES

1	New square delivered through development	See SA3.1
2	New square delivered through development	See SA3.1

3	New square delivered though development	See SA3.1
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PUBLIC REALM ENHANCEMENT OPPORTUNITIES

1	Shopping Centre entrance and roundabout	See SA3.1
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2	Bus station forecourt	See SA3.1
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NEW OPEN SPACE OPPORTUNITIES

1	New Green Space	See SA3.2
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2	New Green Space	Identified potential for new space
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3	New Green Space	Identified potential for new space
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4	New Green Space	Identified potential for new space
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5	New Green Spac	Identified potential for new space
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6	New Green Space	See SA3.2
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7	New Green Space	See SA3.2
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INFILL OPPORTUNITIES

1	Garages. Shrubbery Road	Opportunity for small scale residential development
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2	Car Park. Fore Street	Opportunity for small scale residential development
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3	Car Park. Lacey Close	Opportunity for small scale residential development
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4	Former Clinic. Latymer Road	Opportunity for small scale residential development
5	Garages and Car Park. All Saints Close	Opportunity for small scale residential development
6	Garages. All Saints Close	Opportunity for small scale residential development
7	Car Park. Gareth Drive	Opportunity for small scale residential development
8	Petrol Station. Bounces Road	Opportunity for small scale residential development
9	Garages. Bounces Lane	Opportunity for small scale residential development
10	Yard. Bounces Road	Opportunity for small scale residential development
11	Vacant Plot. Croyland Road	Opportunity for small scale residential development
12	Car Park. Cross Keys Close	Opportunity for small scale residential development
13	Vacant Land. Balham Road	Opportunity for small scale residential development
14	Car Park. Ruskin Walk	Opportunity for small scale residential development
15	Vacant Site. Milestone Close	Opportunity for small scale residential development
16	Car Park. Priory Road	Opportunity for small scale residential development

ENHANCED ACCESS TO BLUE AND GREEN SPACE

1	New gateway to Edmonton Green	See Town Centre Action Plan
2	Improved entrance to Open Space	See Town Centre Action Plan
3	Improved entrance to Cycle Routes and Rivers	See Town Centre Action Plan

NEW WETLANDS OPPORTUNITIES

1	Edmonton Green De-culverting	See Enfield Blue and Green Strategy and meanwhile programme
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NEW RAINGARDEN OPPORTUNITIES

1	Fore Street/ Shrubbery Road	See Enfield Blue and Green Strategy
2	Rain Garden / Swale	See Enfield Blue and Green Strategy
3	Hertford Road Outside Edmonton	See Enfield Blue and Green Strategy
4	Edmonton Green Station Public Realm Rain Gardens	See Enfield Blue and Green Strategy
5	Hertford Road South of Croyland	See Enfield Blue and Green Strategy
6	Fore Street/ Osman Road	See Enfield Blue and Green Strategy
7	Church Street/Latymer Road (Cycle Enfield)	See Enfield Blue and Green Strategy

PL04 ANGEL EDMONTON

REF	DETAILS	NOTES
NEW PUBLIC REALM OPPORTUNITIES		
1	New square delivered through development	See SA4.1
2	New square delivered through development	See SA4.1
3	New square delivered through development	See SA4.1
PUBLIC REALM ENHANCEMENT OPPORTUNITIES		
1	Station / Sterling Way Garden	See Town Centre Action Plan / Levelling Up funding project
2	Station square	See Town Centre Action Plan / Levelling Up funding project
3	Hospital Square	See SA4.4
4	Scott House	See SA4.2
5	Fore Street crossing. Regal Cinema	See Town Centre Action Plan / Levelling Up funding project
6	Bridport Road railway bridge	See Joyce and Snells Planning application
7	Grove Street	See Joyce and Snells Planning application

8	Entrance to Joyce and Snells	See SA4.1
NEW OPEN SPACE OPPORTUNITIES		
1	New Green Space	See SA4.3
2	New Sports Facilities See Selby Planning Application.	See Selby Centre Planning application
3	New Green Space	See SA4.1
4	New Green Space	See SA4.1
5	New Green Space	
INFILL OPPORTUNITIES		
1	Former Public House. Park Road	Opportunity for small scale residential development
2	Car Park. Park Road	Opportunity for small scale residential development
3	Vacant Land. Park Road	Opportunity for small scale residential development
4	Car Park. Park Road	Opportunity for small scale residential development
5	Fairfield Road Car Park	Opportunity for small scale residential development
6	Car Parks. Raynham Road	Opportunity for small scale residential development
7	Vacant Land. Bolton Road	Opportunity for small scale residential development

8	Car Park. Trafalgar Place	Opportunity for small scale residential development
9	Rear Court. Fore Street	Opportunity for small scale residential development

ENHANCED ACCESS TO BLUE AND GREEN SPACE

1	Improved entrance to Florence Green Park	See Town Centre Action Plan / Levelling Up funding project
2	Improved entrance to Florence Green Park	See Town Centre Action Plan / Levelling Up funding project
3	Improved entrance to Florence Green Park	See Town Centre Action Plan / Levelling Up funding project
4	Improved entrance to Pymmes Park	See Enfield Blue and Green Strategy
5	Improved entrance to Pymmes Park	See Enfield Blue and Green Strategy
6	Improved entrance to Pymmes Park	See Enfield Blue and Green Strategy
7	New access to Florence Hayes	See Town Centre Action Plan / Levelling Up funding project
8	Improved entrance to Bull Lane Playing Fields	See Selby Planning Application
9	Improved entrance to Bull Lane Playing Fields	See Selby Planning Application

NEW WETLANDS OPPORTUNITIES

1	Bull Lane Playing Fields	See Selby Centre Planning Application
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2	Florence Green Park	See Enfield Blue and Green Strategy
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PL05 Meridian Water

REF	DETAILS	NOTES
NEW PUBLIC REALM OPPORTUNITIES		
1	Station Square East.	See SA5.2
2	Station Square	See SA5.2
3	River Square	See SA5.5
4	Market Square	See SA5.4
NEW OPEN SPACE OPPORTUNITIES		
1	New Green Space	See SA5.5
2	Edmonton Marshes	See Strategic Infrastructure Works Planning Application
3	New Green Space	See SA5.3
4	New Green Space	See SA5.1
5	New Green Space	See SA5.1
6	New Green Space	See SA5.3
7	New Green Space	See SA5.1
NEW WETLANDS OPPORTUNITIES		

1	New wetland	See Enfield Blue and Green Strategy
2	New wetland	See Enfield Blue and Green Strategy
3	New wetland	See Enfield Blue and Green Strategy
4	New wetland	See Enfield Blue and Green Strategy
5	New wetland	See Enfield Blue and Green Strategy

PL06 SOUTHGATE

REF	DETAILS	NOTES
NEW PUBLIC REALM OPPORTUNITIES		
1	New square delivered though development	See SA6.2
2	New square delivered though development	See SA6.1
3	New square delivered though development	See SA6.1
PUBLIC REALM ENHANCEMENT OPPORTUNITIES		
1	Southgate Roundabout	
2	Southgate Circus	

NEW OPEN SPACE OPPORTUNITIES

1	New Green Space.	See SA6.2
2	New Green Space	Identified opportunity
3	New Green Space.	See SA6.1
4	New Green Space.	Identified opportunity

INFILL OPPORTUNITIES

1	Superstore Car Park	Opportunity for small scale residential development
2	Car Wash. Chase Way	Opportunity for small scale residential development
3	Petrol Station. Chase Way	Opportunity for small scale residential development
4	Car Park. Crown Lane	Opportunity for small scale residential development
5	Car Park. Burleigh Gardens	Opportunity for small scale residential development
6	Garages. Ashfield Parade	Opportunity for small scale residential development
7	Car Park. Durants School	Opportunity for small scale residential development
8	Library and Car Park	Opportunity for small scale residential development
9	Police Station. Chase Side	Opportunity for small scale residential development

10	Vacant Site. Chase Side	Opportunity for small scale residential development
11	Rear Vacant Lands. Chase Side	Opportunity for small scale residential development
12	Car Park. Winchmore Hill Road	Opportunity for small scale residential development
13	Car Park. Southgate Leisure Centre	Opportunity for small scale residential development
14	Car Park. Tudor Way	Opportunity for small scale residential development

ENHANCED ACCESS TO BLUE AND GREEN SPACE

1	Improved Access to Grovelands Park	Identified opportunity
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NEW WETLANDS OPPORTUNITIES

1	Grovelands Lake	See Enfield Blue and Green Strategy
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PL07 NEW SOUTHGATE

REF DETAILS

NOTES

NEW PUBLIC REALM OPPORTUNITIES

1	New square delivered through development	See SA7.2
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PUBLIC REALM ENHANCEMENT OPPORTUNITIES

1	Station Forecourt	Identified opportunity
2	Station Forecourt	Identified opportunity
3	Library Square	

NEW OPEN SPACE OPPORTUNITIES

1	New Green Space	See SA7.5
2	New Green Space	See SA7.3
3	New Green Space	See SA72

INFILL OPPORTUNITIES

1	Garages. The Limes Avenue	Opportunity for small scale residential development
2	Garages. Bowes Road Dental Practice	Opportunity for small scale residential development
3	Car Park. High Road	Opportunity for small scale residential development
4	Garages. Highview Gardens	Opportunity for small scale residential development
5	Car Park. Springfield Road	Opportunity for small scale residential development

ENHANCED ACCESS TO BLUE AND GREEN SPACE

1	Improved entrance to Arnos Park	Identified opportunity
2	Improved entrance to Arnos Park	Identified opportunity

NEW WETLANDS OPPORTUNITIES

1	Arnos Park (fluvial)	See Enfield Blue and Green Strategy
2	Arnos Park (SW)	See Enfield Blue and Green Strategy

NEW RAINGARDEN OPPORTUNITIES

1	Roundabout swale	See Enfield Blue and Green Strategy
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PL08 PALMERS GREEN

REF DETAILS

NOTES

PUBLIC REALM ENHANCEMENT OPPORTUNITIES

1	Devonshire Road Square	Identified opportunity
2	Station Forecourt	Identified opportunity

NEW OPEN SPACE OPPORTUNITIES

1	New Green Space	See SA8.2
2	New Green Space	See SA8.1

INFILL OPPORTUNITIES

1	Vacant Land. Palmerston Crescent	Opportunity for small scale residential development
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2	Vacant Land. A406	Opportunity for small scale residential development
3	Garages. 217 Green Lanes	Opportunity for small scale residential development
4	Car Parks. Bridge Drive	Opportunity for small scale residential development
5	Car Park. Palmers Green Station	Opportunity for small scale residential development
6	Garages. Devonshire Close	Opportunity for small scale residential development
7	Vacant Land. Green Lanes	Opportunity for small scale residential development
8	Car Park. Hedge Lane	Opportunity for small scale residential development
9	Old Stables. Broomfield Park	Opportunity for small scale residential development
10	Garages. Ecclesbourne Close	Opportunity for small scale residential development
11	Vacant Plot. Elmdale Road	Opportunity for small scale residential development

ENHANCED ACCESS TO BLUE AND GREEN SPACE

1	Improved entrance to Broomfield Park	Identified opportunity
2	Improved entrance to Broomfield Park	Identified opportunity
3	Improved access to New River Walk	Identified opportunity

4	Improved entrance to Broomfield Park	Identified opportunity
5	Improved access to New River Walk	Identified opportunity
6	Improved access to New River Walk	Identified opportunity
7	Improved access to New River Walk	Identified opportunity
8	Improved access to New River Walk	Identified opportunity
9	Improved entrance to Broomfield Park	Identified opportunity
10	Improved entrance to Broomfield Park	Identified opportunity
11	Improved entrance to Broomfield Park	Identified opportunity
12	Improved entrance to Broomfield Park	Identified opportunity
13	Improved access to New River Walk	Identified opportunity
NEW RAINGARDEN OPPORTUNITIES		
1	Osborne Road/ Green Lanes	See Enfield Blue and Green Strategy
2	Windsor Road/ Green Lanes	See Enfield Blue and Green Strategy

Appendix 2: PQ60 - modifications proposed by the Council, arising from the proposed deletion of Appendix E.

Page	Section, paragraph or Policy	Proposed Modification	Council Comment
143	Policy SC2: Protecting and Enhancing Social and Community Infrastructure, para 4	4. Developer contributions will be sought towards new school <u>and childcare</u> places to meet the needs arising from new housing development (excluding care homes), taking account of available capacity within existing schools and the number of pupils it will generate, from early years through to secondary education. New or expanded schools for larger sites will be expected to incorporate specialist provision where demand exists and make reasonable adjustments to support the needs of the disabled and mobility impaired. In exceptional circumstances, a contribution towards off-site outdoor play space will be accepted in the vicinity of the school in lieu of on-site provision. These provisions and contributions will be captured through Planning obligations.”	To ensure Policy SC2 is appropriate in scope. Reference to be made to childcare places.
144	Para 5.10	<i>New para under existing para 5.10:</i> “ <u>The current (2024/25) per dwelling contribution for new school and childcare places is £3,324 per dwelling. This rate will be annually adjusted in line with the Community Infrastructure Levy (CIL) charging schedule and reviewed as necessary to ensure school and childcare places can be delivered to meet the needs arising from new development.</u> ”	
156	Para 6.19	“The Epping Forest Strategic Access Management and Monitoring Strategy (SAMMS) Governance and Tariff Schedule has been developed and agreed upon by all relevant parties. This strategy will	To update the sum payable, and to add a

Page	Section, paragraph or Policy	Proposed Modification	Council Comment
		<p>ensure the implementation of mitigation measures at the SAC. It identifies the measures that are capable of being delivered within the SAC to mitigate impacts on-site. The Strategy also details the mechanisms for delivery and monitoring, including securing financial contributions from new residential developments within the Zol. Any development resulting in a net increase in new homes within the ZOI will be subject to development contributions. The current <u>(2024/25) SAMMS</u> charge per net additional <u>dwelling unit in 2022/23</u> is £45.40, payable upon commencement. <u>There is also a £90 administrative charge.</u> This <u>The SAMMS charge</u> will be annually adjusted in line with the Community Infrastructure Levy (CIL) charging schedule and reviewed as part of future plan reviews. In exceptional circumstances the authority will determine where this payment can be covered through Community Infrastructure Levy Payments.”</p>	<p>reference to the administrative charge.</p>
156	Para 6.21	<p>“The Council will provide strategic mitigation capacity as set out in the Recreational Mitigation Strategy to help facilitate planning applications for development allocated in the ELP. Development contributions are required for strategic recreational mitigation in cases where there is a net increase in new homes within the zone of influence. The current <u>(2024/25)</u> estimate of recreational mitigation in 2022/23 is £353 per dwelling, to be paid upon commencement through S106 agreements or unilateral undertakings. <u>There is also a £90 administrative charge.</u> This fee <u>The recreational mitigation charge</u> will be annually adjusted in line with the CIL charging schedule and reviewed as part of future plan reviews. In exceptional circumstances, the authority will determine where this payment can be covered through Community Infrastructure Levy Payments.”</p>	<p>To update the sum payable, and to add a reference to the administrative charge.</p>

Page	Section, paragraph or Policy	Proposed Modification	Council Comment
231	Policy H2: Affordable Housing, para 5b	“b. provide affordable housing on-site within residential and mixed-use schemes. In exceptional circumstances, off-site provision or contributions of broadly equivalent value (<u>taking into account the costs of land, building and servicing</u>) will be considered acceptable. This may occur where it:”	To help explain what is meant by “equivalent value”. Text pulled through from Appendix E.
267	Policy E9: Local Jobs, Skills and Local Procurement, para 2c	“c. make a financial contribution towards industrial land regeneration projects, employment training schemes, job brokerage services or business support initiatives (which will be calculated on the basis of the formula set out in Appendix D).	To reflect deletion of Appendix E (note, incorrect reference in Policy E9 to “Appendix D”).
269	Paragraph 9.64	“9.64 In the event where employing a trainee for a full-year is not possible, a fee will be charged for each week in which a trainee placement was not provided on site, equivalent to the current London Living Wage, calculated <u>using</u> on the following formula: set out in Appendix E . <u>London Living Wage x 36 (hours worked a week) x 2 (incentive to fulfil obligation) x 52 (apprentice for full year) + 10% administration fee</u> ”	To reflect deletion of Appendix E and pull through the approach to calculating the financial contribution (where due).
269	Paragraph 9.65	“Part 2c of this policy sets out a requirement to either relocate business affected by the loss of employment or jobs resulting from development to suitable premises in the Borough, provide the equivalent number of jobs elsewhere within the Borough or make a financial contribution based on the number of jobs lost <u>multiplied by £3,500 (figure for 2024/25)</u> . The assessment of loss will be calculated at the point of submission of the planning application (see	To reflect deletion of Appendix E and pull through the approach to calculating the financial contribution (where due).

Page	Section, paragraph or Policy	Proposed Modification	Council Comment
		Appendix E).-Where development involves the loss of vacant employment space, employment densities, evidence on vacancy periods and marketing efforts will be used to establish the potential number of jobs lost.”	
318	Paragraph 12.35	<p><i>New para under existing para 12.35:</i></p> <p><u>“Where on site standards for open space are not met, a financial contribution towards an open space in the vicinity of/ impacted by the development will be required. Similarly, where on site standards for play space are not met, a financial contribution towards play space will be required.”</u></p>	To reference the potential need for financial contributions towards open space and play space (as currently referenced in Appendix E).
341	Paragraph 15.8	<p>“15.8 This policy also aims to maximise contributions from development towards the delivery of affordable housing and infrastructure, based on the policy thresholds set out in this plan. Developers will be expected to assess the quality and capacity of existing infrastructure in partnership with relevant providers and service delivery stakeholders and contribute towards the timely provision of improvements and/or additional capacity to meet the demands arising from new development. Appendix E of the ELP sets out the thresholds to calculate planning obligations through new development, in line with the priorities set out above.</p>	To reflect the deletion of Appendix E.
348	Para 15.28	<p><i>“15.28 In order to deliver the spatial vision and strategic objectives outlined in the ELP, the Council will monitor the implementation of policies, proposals and infrastructure projects on an annual basis. Key indicators are set out in the ELP’s monitoring framework in Appendix E B.”</i></p>	To correct the Appendix reference. Reference should be to Appendix B (not Appendix E).

Page	Section, paragraph or Policy	Proposed Modification	Council Comment
581	Appendix E	<i>Delete Appendix E in its entirety.</i>	Because the Appendix will quickly date and could (incorrectly) be interpreted as an exhaustive list of potential developer contributions.

Appendix 3: PQ62 – Schedule to identify ELP policies that refer to non-development plan documents accompanied by Council view on necessity.

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
28	Policy SS1 – para 12	Supplementary Planning Document.	Reference is to the need for future preparation of a Supplementary Planning Document or similar subsequent planning mechanism. Considered necessary and appropriately worded.
33	Policy SS2, para 2	Planning Brief and Supplementary Planning Documents.	Reference is to the need for future preparation of Planning Briefs (for the largest developments, to be progressed as Supplementary Planning Documents). Considered necessary and appropriately worded.
34	Policy SS2, para 3	Supplementary Planning Documents, Area Investment Plans, Masterplans and Planning Briefs.	Reference is to the need for future preparation of these documents (with further details in the Placemaking policies for each placemaking area). Considered necessary and appropriately worded.
34	Policy SS2, para 3	Masterplan and Borough-wide Design Guide.	<p>Upon review, the Council recognise that the final sentence of para 3 could be misinterpreted. Proposals will need to accord with the ELP policies and London Plan policies, even after the preparation of area-specific Masterplan SPDs. The Council would like to propose a Modification to delete the final sentence of para 3, as in practice, it is superfluous -</p> <p>“For the other placemaking areas, pending the preparation and adoption of area-specific Masterplan SPDs (or any subsequent similar planning mechanism), and pending the preparation of a Borough-wide Design Guide, proposals for development will be</p>

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
			considered on the basis of good growth principles and policies included in this Plan and the London Plan.
41	Policy PL1, para 1	Existing Enfield Town Masterplan and possible preparation of a new Enfield Town Design Guide.	Policy PL1 commits Council to preparing further guidance (either in the form of an update to the Enfield Town Masterplan, or in the form of a Design Guide). It is clearly stated that this will be guidance, and that development should “have regard” to such guidance. Considered necessary and appropriately worded.
52	Policy PL3, para 1	Edmonton Vision.	Edmonton Vision is part of the evidence base for the ELP. Reference considered necessary and appropriately worded (i.e. “have regard to”...).
52	Policy PL3, para 1	Design Code and sustainable place making strategies.	Design Codes and sustainable place making strategies may be prepared for this area, to supplement the policy. Reference considered necessary and appropriately worded.
59	Policy PL4, para 1	Edmonton Vision.	Edmonton Vision is part of the evidence base for the ELP. Reference considered necessary and appropriately worded (i.e. “have regard to”...).
65	Policy PL5, para 1	Masterplan.	Policy states that individual phases must conform with a masterplan for the whole placemaking area that is supported by the Council. To ensure this element of Policy PL5 is justified, the Council propose a Modification, as follows – “To ensure that development in the Meridian Water placemaking area comes forward in a strategic and comprehensive manner, planning <u>permission applications</u> for

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
			individual phases <u>should generally</u> must conform with a masterplan for the whole placemaking area that is supported by the Council.”
66	Policy PL5, para 9	Lee Valley Biodiversity Action Plan.	To ensure the reference to the Lee Valley Biodiversity Action Plan is justified, the Council propose a Modification, as follows – “Planting must be consistent with the habitats and character of the Lee Valley Regional Park and must be composed of a diverse range of native species, <u>having regard to</u> in accordance with the Lee Valley Biodiversity Action Plan (and any updated ing successor), whilst also ensuring species choice is resilient to climate change.”
71	Policy PL6, para 1	Coordinating plan, which could be adopted as a Supplementary Planning Document (SPD).	Reference is to exploring the need to prepare a coordinating plan. Reference considered necessary and appropriately worded. However, to ensure para 1 of Policy PL6 is justified, the Council would like to propose a Modification to para 1, as follows – “...characteristics. The Council will explore the need for preparing a coordinating plan, which could be adopted as a Supplementary Planning Document (SPD) <u>or any similar subsequent planning mechanism</u> , to support the delivery of the placemaking vision for Southgate. <u>Development here should have regard to such guidance.</u> in this area must be brought forward in accordance with the guidance that is brought forward or any subsequent planning mechanism.”
71	Policy PL6, para 7	Public realm strategy.	Reference is to preparation of a public realm strategy. Considered necessary and appropriately worded.

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
75	Policy PL7, para 1	Joint area planning framework.	Reference is to the potential for a joint area planning framework to be realised (prepared). Reference considered helpful and appropriately worded.
75	Policy PL7, para 2	Masterplans, design codes, and sustainable place making strategies.	States that the Council may use these planning tools to support the delivery of this policy. The Council recognise that the second sentence of para 2 needs to be revised to ensure that is justified – “Development <u>here should have regard to such guidance in this area must be brought forward in accordance with any such guidance for this area.</u> ”
86	Policy PL9, para 4	Enfield Chase landscape restoration strategies.	Requirement is to “have regard” to these strategies, when bringing forward proposals for Biodiversity Net Gain. Reference considered necessary and appropriately worded.
93	Policy PL10, para 2	Supplementary Planning Document. Masterplan.	<p>To ensure the first sentence of para 2 of Policy PL10 is justified, the Council would like to propose a Modification, as follows: “Development across the Chase Park Placemaking Area will be delivered to create a high quality, distinctive, well connected, sustainable new neighbourhood in accordance with the vision for Chase Park, the key principles and requirements set out below and any other relevant policies in the Enfield Local Plan. <u>Development proposals should also have regard to</u> or other relevant supplementary planning guidance.”</p> <p>In terms of the policy phrasing in relation to the proposed Chase Park Masterplan (i.e. the masterplan will be used as a “benchmark in reviewing proposals for development”) - this wording is considered justified and appropriate.</p>

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
94	Policy PL10, para 11	Site wide Masterplan.	To ensure the first sentence of para 11 of Policy PL10 is justified, the Council would like to propose a Modification, as follows: "Planning applications for whole or parts of allocated sites must be in accordance with the polices set out in the Local Plan and <u>should follow the additional guidance set out in the an approved site wide Masterplan.</u> "
107	Policy PL11, para 2	Masterplan and Supplementary Planning Document.	<p>To ensure the first sentence of para 2 of Policy PL11 is justified, the Council would like to propose a Modification, as follows: "Development across the Crews Hill Placemaking Area (CHPA) will create a high quality, distinctive, well connected, sustainable new neighbourhood in accordance with the vision for Crews Hill, the key principles and requirements set out below and in accordance with other relevant policies in the Enfield Local Plan. <u>Development proposals should also have regard to or other relevant supplementary planning guidance.</u>"</p> <p>In terms of the policy phrasing in relation to the proposed Crews Hill Masterplan (i.e. the masterplan will be used as a "benchmark in revieing proposals for development") - this wording is considered justified and appropriate.</p>
108	Policy PL11, para 14	Site wide Masterplan.	To ensure the first sentence of para 14 of Policy PL11 is justified, the Council would like to propose a Modification, as follows: "Planning applications for whole or parts of allocated sites must be in accordance with the polices set out in the Local Plan and <u>should follow the additional guidance set out in the an approved site wide Supplementary Planning Document (SPD).</u> "

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
119	Policy SE1, para 7	Infrastructure Delivery Plan.	Reference is to the Council working with partners to improve wastewater infrastructure in line with the Council's Infrastructure Delivery Plan. Considered necessary and appropriately worded.
121	Policy SE2, para 1	Sustainable design and construction statement.	Policy SE2 sets out a requirement for applicants to submit a sustainable design and construction statement, covering the matters set out in the Policy. Considered necessary and appropriately worded.
122	Policy SE3, para 1	Circular economy statement.	Policy SE3 sets out a requirement for major development proposals to be accompanied by a circular economy statement, addressing the objectives set out in the Policy. Considered necessary and appropriately worded.
122	Policy SE3, para 2	Associated guidance.	To ensure the first sentence of para 2 of Policy SE3 is justified, the Council would like to propose a Modification, as follows – "Major development proposals are required to calculate whole-life cycle carbon emissions through a nationally recognised whole life cycle carbon assessment tools, in line with London Plan Policy SI 2, or its subsequent update, and <u>taking into account</u> associated guidance."
124	Policy SE4, para 1, b	Energy Statement.	Policy requires provision of an Energy Statement (for schemes above the thresholds stated in para 1). Reference considered necessary and appropriately worded.

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
125	Policy SE4, para 7	Passivhaus PHPP and CIBSE TM54 Operational Energy.	These performance methodologies are referenced, and are to be used, to demonstrate compliance with the targets stated in Policy SE4. References considered necessary and appropriately worded.
125	Policy SE4, para 10	Infrastructure Delivery Plan and Enfield Decentralised Energy Networks Supplementary Planning Document.	<p>Policy SE4 references the IDP in relation to energy infrastructure, and any identified requirements for infrastructure upgrades. Reference considered helpful and appropriately worded.</p> <p>To ensure the last of Policy SE4 para 10 is justified, the Council would like to propose a Modification, as follows – “All such developments shall comply with <u>should have regard to the guidance set out in</u> the Enfield Decentralised Energy Networks Supplementary Planning Document and any updating successor.”</p>
129	Policy SE6, para 2	Overheating assessments and GLA's Energy Assessment Guidance.	<p>Policy SE6 para 2, requires major developments to be accompanied by an overheating assessment. Reference considered necessary and appropriately worded.</p> <p>The reference to the GLA's Energy Assessment Guidance is to assist applicants in understanding the form of 'detailed analysis' required (in relation to overheating risks). The reference to the Energy Assessment Guidance is considered helpful and appropriately worded.</p>
131	Policy SE7, para 1a	Strategic Flood Risk Assessment.	The SFRA identifies all potential sources of flooding in Enfield and is referenced to assist applicant's when assessing the risk of their site flooding. The reference is considered necessary and appropriately worded.

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
131	Policy SE7, para 1b	Technical Guidance to the National Planning Policy Framework.	The Technical Guidance is referenced in relation to the flood risk vulnerability classifications. The reference is considered necessary and appropriately worded, ensuring that Policy SE7 will remain up to date even if the Technical Guidance to the NPPF is updated.
131	Policy SE7, paras 1d and 3	Flood Risk Assessment.	Requirement for a Flood Risk Assessment (and for this to be prepared in accordance with the SFRA) is considered necessary and appropriately worded.
131	Policy SE7, paras 2 and 3	Groundwater Flood Risk Assessments.	Requirement for a Groundwater Flood Risk Assessment (in the circumstances outlined) is considered necessary and appropriately worded.
135	Policy SE8, paras 1e, 2b and 2c	Thames River Basin Management Plan.	To ensure para 1e of Policy SE8 is justified, the Council would like to propose a Modification, as follows – “e. enhance the ecological, flood risk, water quality aesthetic and amenity quality of the watercourse and apply <u>having regard to</u> the objectives of the Thames River Basin Management Plan.” The references to the Management Plan in paras 2b and 2c are considered necessary and appropriately worded.
135	Policy SE8, para 4	Water Framework Directive Assessment.	Reference considered necessary and appropriately worded.
136	Policy SE9, para 1 (and paras 10 and 11)	Sustainable Drainage Strategy.	Reference considered necessary and appropriately worded.

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
136	Policy SE9, para 2	SuDS Good Practice Guidance.	A footnote provides a link to this guidance. To ensure the second sentence of para 2 of Policy SE9 is justified, the Council would like to propose a Modification, as follows – “ In accordance with <u>Having regard to</u> SuDS good practice guidance ¹⁹ , developments must aim to maximise source control SuDS measures.”
136	Policy SE9, para 9	Local Flood Risk Management Strategy.	To ensure para 9 of Policy SE9 is justified, the Council would like to propose a Modification, as follows – “Where appropriate, developments should must incorporate relevant measures identified in the Local Flood Risk Management Strategy.”
141	Policy SC1, para 2	Health Impact Assessment.	Policy SC1 requires a Health Impact Assessment to be prepared, for the forms of development outlined. The reference is considered necessary and appropriately worded.
141	Policy SC1, para 2 (final bullet point)	Enfield Health and Wellbeing Strategy.	The reference is considered necessary and appropriately worded, requiring applicants to “take account” of the priorities set out in the Enfield Health and Wellbeing Strategy.
143	Policy SC2, para 5	Strategic health needs assessment, pharmaceutical assessment and relevant NHS strategies.	The references are considered necessary and appropriately worded, requiring applicants to “take account” of the latest strategic health needs assessment, pharmaceutical assessment and relevant NHS strategies.
147	Policy BG1, para 1d	Enfield's Blue and Green Strategy.	To ensure para 1d of Policy BG1 is justified, the Council would like to propose a Modification, as follows – “d. improving the quality, character, value and accessibility of existing publicly accessible

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			open spaces and water spaces across the Borough, <u>having regard to in line with the</u> priorities of Enfield's Blue and Green Strategy or successor documents;"
147	Policy BG1, para 1i	Blue and Green Infrastructure Audit and London Biodiversity Action Plan.	Reference considered necessary and appropriately worded.
152	Policy BG2, para 1a	Habitats Regulation Appropriate Assessment.	Reference considered necessary and appropriately worded.
154	Policy BG3, para 2	Appropriate Assessment.	Reference considered necessary and appropriately worded.
154	Policy BG3, para 3 i) and 5	Council's Recreational Mitigation Strategy.	Reference considered necessary and appropriately worded.
154	Policy BG3, para 3 ii)	Epping Forest SAC Strategic Access Management and Monitoring (SAMM) Strategy.	Reference considered necessary and appropriately worded.
158	Policy BG4, para 2	Action plan.	Policy BG4 requires applicants to submit an action plan setting out how biodiversity improvements will be achieved. Reference considered necessary and appropriately worded.

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158	Policy BG4, para 4	Enfield Chase Landscape Recovery Strategy and subsequent London Local Nature Recovery Strategy.	Policy reference to these documents is considered necessary and appropriate (with para 4 requiring proposals to “have regard” to these documents).
158	Policy BG4, para 4	Enfield Chase Landscape Recovery Strategy and subsequent London Local Nature Recovery Strategy.	Policy reference to these documents is considered necessary and appropriate (with para 4 requiring proposals to “have regard” to these documents).
162	Policy BG6, para 1c	Character of Growth Study.	Reference to the Character of Growth Study is considered helpful and appropriately worded. The reference is intended to assist applicants in understanding the local landscape (in terms of its key characteristics and issues).
164	Policy BG7, para 3	Concept masterplans.	To ensure para 3 of Policy BG7 is justified, the Council would like to propose a Modification, as follows – “Where enhancements have been identified as part of the concept masterplans <u>illustrative framework plans</u> included as part of <u>in the Local Plan, or in masterplans prepared to address the requirements of other policies in the Local Plan,</u> such improvements must <u>should</u> be included in the development proposals.”
164	Policy BG7, para 4	Enfield Chase Landscape Restoration scheme.	Reference considered necessary and appropriately worded.

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165	Policy BG7, para 6a	Green Infrastructure Audit and emerging Spatial Vision for Enfield Chase Landscape Restoration.	Reference considered necessary and appropriately worded.
167	Policy BG9, para 1d	Biodiversity Action Plan.	Reference considered necessary and appropriately worded. The requirement is for development to provide ecological and biodiversity enhancements to water spaces, "having regard" to the of the Biodiversity Action Plan.
176	Policy BG13, para 1	Blue-green infrastructure plan (included as part of a Design and Access Statement).	Reference considered necessary and appropriately worded.
176	Policy BG13, para 1b	Blue and Green Strategy and Blue and Green Audit (2020),	Reference considered necessary and appropriately worded. Whilst these documents are not development plan documents, the policy is considered sufficiently flexible, requiring proposals to "contribute towards" the opportunities and priorities set out in the Blue and Green Strategy. The Blue and Green Audit (2020) helps identify those areas where improving access to open space and nature is particularly important.
180	Policy DE1, para 2a	Character of Growth Study.	Reference considered necessary and appropriately worded. Policy requirement is for applicants to "make reference" to the conclusions and recommendations of the CoG Study.

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180	Policy DE1, para 3	Secured by Design.	Reference considered necessary and appropriately worded.
183	Policy DE2, para 1	Design and Access Statement.	Reference considered necessary and appropriately worded.
185	Policy DE3, para 1	Inclusive Access Statement (as part of a Design and Access Statement).	Reference considered necessary and appropriately worded.
187	Policy DE4, para 1	Conservation area appraisals, management proposals, Article 4 Directions, Local Heritage List, the Heritage Strategy and Registered Park and Garden Management appraisals and management proposals.	Reference to these documents is in terms of the Council's commitment to continue to review and update these documents. The references are considered necessary and appropriately worded.
190	Policy DE5, para 1	Conservation area character appraisals and Supplementary Planning Documents.	The reference to these documents is to assist applicants in identifying shorter distance local views (that may require consideration in preparing development proposals). References considered necessary and appropriately worded.
190	Policy DE5, para 2	London View Management Framework	To ensure the third sentence of para 2 of Policy DE5 is justified, the Council would like to propose a Modification, as follows – “For schemes with a greater impact, fully rendered and verified visual representations may be required, <u>having regard to in line with</u>

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		Supplementary Planning Guidance.	the guidance contained within the London View Management Framework Supplementary Planning Guidance ³⁷ .”
194	Policy DE6, para 15	Secured by Design and Design and Access Statements.	References considered necessary and appropriately worded.
199	Policy DE7, para 2a	Manual for Streets, Healthy Streets Approach and any locally specific guidance produced or endorsed by the Council.	To ensure para 2a of Policy DE7 is justified, the Council would like to propose a Modification, as follows – “a. be consistent with best practice (such as Manual for Streets or later equivalents and the Healthy Streets Approach) and <u>have regard to</u> any locally specific guidance produced or endorsed by the Council.”
199	Policy DE7, para 4d	Healthy Streets indicators.	Reference considered helpful and appropriately worded.
206	Policy DE10, para 3a	Heritage Strategy, Conservation Area Character Appraisals and Management Plans.	Policy DE10 states that the Council will support development which aligns with the aims and objectives of the referenced documents. Reference to the documents is considered necessary and appropriately worded.
207	Policy DE10, para 7a	Management Plans.	To ensure para 7a of Policy DE10 is justified, the Council would like to propose a Modification, as follows – “ align with <u>have regard to</u> the objectives of the relevant Management Plans;”

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207	Policy DE10, para 8	Archaeological Desk Based Assessment.	Policy DE10 sets out the circumstances where an Archaeological Desk Based Assessment will be required. Reference considered helpful and appropriately worded.
207	Policy DE10, para 10	Conservation Area Appraisals and Management Plans.	References considered necessary and appropriately worded.
210	Policy DE11, para 2	Characterisation Study.	Reference considered necessary and appropriately worded.
213	Policy DE13, para 1c (and para 2)	BRE guidance on daylight and sunlight.	References considered necessary and appropriately worded. The requirement in para 1c is to “have regard” to best practice.
213	Policy DE13, para 1e	Mayor of London’s Housing Supplementary Planning Guidance, Building Regulations, BRE Home Quality Mark and other best practice guidance documents.	To ensure para 1e of Policy DE13 is justified, the Council would like to propose a Modification, as follows – “e. provides a well-designed, flexible and functional layout, with adequately sized rooms, <u>having regard to</u> in accordance with the Mayor of London’s Housing Supplementary Planning Guidance, Building Regulations, BRE Home Quality Mark and other best practice guidance documents.”
213	Policy DE13, para 1f	Mayor of London’s guidance relating to accessible housing.	To ensure the first sentence of para 1f of Policy DE13 is justified, the Council would like to propose a Modification, as follows – “f. meets <u>has regard to</u> standards in local and the Mayor of London’s guidance relating to accessible housing.”

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
213	Policy DE13, para 6	Housing Design Standards LPG (2023).	The policy requirement is for developments to maximise dual aspect dwellings. The reference to the LPG is considered helpful and appropriate.
216	Policy DE14, para 4	BRE guidance.	To ensure para 4 of Policy DE14 is justified, the Council would like to propose a Modification, as follows – “4. Private amenity space should achieve good levels of sunlight, in line with <u>having regard to BRE guidance on daylight and sunlight.</u> ”
232	Policy H2, para 7	London Plan guidance (in relation to review mechanisms).	To ensure para 7 of Policy H2 is justified, the Council would like to propose a Modification, as follows – “7. To maximise affordable housing delivery, review mechanisms will be used over the lifetime of the development, <u>having regard to</u> in line with relevant London Plan guidance. For schemes following the Viability Tested Route (VTR), the following provisions will apply:”
235	Policy H3, para 1a	Local Housing Needs Assessment (2020).	Reference considered necessary and appropriately worded.
235	Policy H3, para 2	Nationally Described Space Standard.	Reference considered necessary and appropriately worded.
237	Policy H4, para 4	Design and characterisation guidance.	Policy H4 (para 4) sets out that the Council will prepare design and characterisation guidance (as appropriate). The Policy states that proposals will be expected to “have regard” to this planning guidance – and therefore the reference is considered appropriately worded.

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
246	Policy H8, para 1d (fifth bullet)	London Plan Guidance.	To ensure para 1d (fifth bullet) of Policy H8 is justified, the Council would like to propose a Modification, as follows – “ compliance with <u>regard is had to</u> any relevant standards for this type of scheme set out in London Plan Guidance; and submission of a management plan <u>is submitted</u> along with the planning application; and”
256	Policy E2, para 1	Economic Development Strategy.	Reference considered necessary and appropriately worded.
267	Policy E9, para 1	Employment and Skills Plan.	Policy E9 sets out the circumstances where an Employment and Skills Plan needs to be prepared to accompany a planning application. The reference is considered necessary and appropriately worded.
272	Policy E11, para 4c	International Commission guidelines.	Reference considered necessary and appropriately worded.
278	Policy E12, para 2b	Masterplan.	Policy E12 (para 2b) references a masterplan for Parcel D, that facilitates a future LSIS designation. The statement of intent is considered helpful and appropriately worded.
287	Policy TC2, para 4	Impact assessment.	Reference considered necessary and appropriately worded.
293	Policy TC5, para 2	Culture Connects and the Heritage Strategy.	References considered helpful and appropriately worded, on the basis that proposals will be supported where they align with the referenced documents.
294	Policy TC6, para 3	Cumulative Impact Assessment.	Reference considered necessary and appropriately worded.

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301	Policy RE3, para 9b	Sustainable Travel Plans.	Policy RE3, para 9b, sets out that Travels Plans are expected to demonstrate how the traffic impacts of development have been considered and mitigated. Reference considered necessary and appropriately worded.
306	Policy CL1, para 1 (and para 2b)	Cultural Strategy for Enfield (2020-2025)	<p>Reference in para 1 considered helpful and appropriately worded, on the basis that proposals will be supported where they align with the Cultural Strategy for Enfield.</p> <p>To ensure the reference in para 2b is justified, the Council would like to propose a Modification, as follows – “alternative provision has been made in the vicinity to an equal or better standard, in line with <u>having regard to</u> the priorities set out in the Cultural Strategy for Enfield (2020-2025) or any updated strategy;”</p>
312	Policy CL4, para 1	Enfield Health and Well Being Strategy.	Policy CL4 states that developments that align with the objectives of the Enfield Health and Well Being Strategy will be supported. The wording is considered helpful and appropriate, on the basis that the policy is setting out where proposals will be supported (and refers to alignment with objectives, rather than more specific requirements).
312	Policy CL4, para 1c	Playing Pitch Strategy and Blue and Green Infrastructure Strategy.	The references are considered helpful and appropriate, on the basis that the policy is setting out where proposals will be particularly supported. Para 1c refers to “ <i>being in line with the priorities set out in the Playing Pitch Strategy and Blue and Green Infrastructure Strategy</i> ” (rather than referring to a need to be in line with more specific requirements).

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315	Policy CL5, para 1	Enfield Playing Pitch Strategy, Enfield Built Sports Facility, and their respective Actions Plans.	To ensure the reference in para 1 is justified, the Council would like to propose a Modification, as follows – “Proposals involving the creation of new sports facilities or the enhancement of existing ones, specifically where a need has been identified, will be supported, particularly in or close to town centres and easily accessible locations. Proposals that include bringing private and educational related sports will be supported, with the condition that these developments maintain or enhance their quality standards and reflect <u>should have regard to</u> the most up to date Enfield Playing Pitch Strategy, Enfield Built Sports Facility <u>Assessment</u> and their respective Action Plans”.
315	Policy CL5, para 4	Blue and Green Infrastructure Strategy.	Reference considered necessary and appropriately worded.
315	Policy CL5, para 5	Accessible Natural Greenspace Standard.	Reference considered necessary and appropriately worded. The phrasing “adhere to the principles” provides some flexibility in the application of the Accessible Natural Greenspace Standard.
316	Policy CL5, para 6h	Enfield Biodiversity Action Plan.	Reference considered necessary and appropriately worded.
316	Policy CL5, para 9	Playing Pitch Strategy and Blue and Green Infrastructure Strategy.	The references to these documents are in terms of identifying existing deficiencies. The references are therefore considered necessary and appropriate.
323	Policy T1, para 3	Construction Logistics Plans, Travel Plans and Delivery Service Plans.	Requirement is for these plans to accompany planning applications. References considered necessary and appropriately worded.

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
323	Policy T1, para 6c	Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments.	Requirement is for these plans to accompany planning applications. References considered necessary and appropriately worded.
324	Policy T1, para 8	Appropriate guidance, such as LTN 1/20 or its successor.	To ensure the reference in para 8 is justified, the Council would like to propose a Modification, as follows – “Developments should promote cycling in the Borough and ensure a safe and accessible environment for cyclists, having regard complying to the appropriate guidance, such as LTN 1/20 or its successor.”
324	Policy T1, para 8b	LTN1/20.	To avoid repetition with para 8, the Council would like to propose a Modification to para 8b, as follows – “b. providing for or making contributions towards connected, high quality, convenient and safe cycle routes within and beyond the development site, in line or exceeding LTN 1/20. These routes should be permeable and well lit, incorporating green chains and links as set out on the Policies Map.
325	Policy T2, para 1a	Regional and local guidance and standards. Healthy streets indicators set out in Transport for London’s guidance.	To ensure the reference in para 1a is justified, the Council would like to propose a Modification, as follows – “a. improve walking access and routes to local services, including schools and retail locations, by incorporating new safe, effective and efficient routes, networks and streets, <u>having regard to</u> designed in accordance with regional and local guidance and standards. This includes adhering to <u>(including the healthy streets’ indicators set out in Transport for London’s guidance).</u> ”

ELP Page	Para(s), Policy or Figure	Other documents referenced	Council Comment/ Response
326	Policy T3, paras 3 and 5	Transport Assessment.	Policy T3 sets out the role of Transport Assessments in achieving 20-minute accessibility to destinations and services. It also sets out their role in identifying traffic impacts and potential mitigation. The references are considered necessary and appropriately worded.
332	Policy ENV1, para 1	Air quality assessments and Enfield Air Quality Action Plan.	Policy ENV1 sets out the circumstances where an air quality assessment will be required. One of those circumstances is where a site lies in an Air Quality Focus Area, as defined in the Enfield Air Quality Action Plan. The references are considered necessary and appropriately worded.
332	Policy ENV1, paras 2, 5 and 6	Noise Assessment, Contamination Assessment and Risk Assessments.	Policy ENV1 sets out the circumstances where these assessments would be required. The references are considered necessary and appropriately worded.
339	Policy D1, para 1	Community Infrastructure Levy, Mayor of London's Community Infrastructure Levy.	The reference is considered necessary and appropriately worded.
344	Policy D2, para 1	Masterplan.	Policy D2 sets out the requirement for preparation of masterplans, and the key matters these should address. The references to 'masterplans' are considered necessary and appropriately worded.
346	Policy D3	Infrastructure Delivery Plan.	The reference is considered necessary and appropriately worded.