# Enfield Local Plan

## Regulation 22 Consultation Statement

**Report on the consultation of the Enfield Local Plan: Proposed Submission Document**

**Revised November 2024**

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ENFIELD Council

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# 1. Introduction

## Purpose of this statement

1.1 This Consultation Statement sets out how the Council has involved residents and key stakeholders and specified bodies in preparing the Enfield Local Plan ELP) 2019-2041 in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI) May 2023.

1.3 The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. Full details of the current adopted Enfield SCI 2023 can be viewed https://www.enfield.gov.uk/services/planning/local-development-scheme#statement-of-community-involvement.

1.4 The Council has also prepared a separate Duty to Cooperate (DtC) Statement of Compliance dated August 2024, which is published on the examination webpage and provides further details on specific DtC matters.

## Background to the Enfield Local Plan

1.5 This Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the ELP, setting out how such efforts have shaped the Plan and the main issues raised through consultation by representations.

1.6 The Council began preparing a revised Local Plan for the borough in 2016. The ELP sets out the strategic vision, objectives and spatial strategy for the Borough, as well as the planning policies which will guide future development over the Plan period.

1.7 The Plan will look ahead to 2041 and identify the main areas for sustainable development growth across the borough. It establishes policies and guidance to ensure local development is delivered in accordance with the principles set out in the National Planning Policy Framework (NPPF).

1.8 Once adopted, the new ELP will fully replace and consolidate the policies and site allocations in the previously adopted Local Plan within a single new Local Plan. The Development Plan Documents to be replaced upon adoption of the new ELP, are the Core Strategy (2010), Development Management Document (2014), Edmonton Leeside Area Action Plan (2020), North East Enfield Area Action Plan (2016) and North Circular Area Action Plan (2014).

1.9 The Draft Local Plan Regulation 19 consultation stage (March 2024) was approved for publication for a minimum 6-week period of public consultation by Full Council on 19 March 2024. The Draft Local Plan and associated supporting documents were also published in accordance with *Regulation 19* for the statutory consultation period During this stage, the Council consulted all specific and statutory consultation bodies, local residents' groups, businesses and individual residents in accordance with the SCI. The Council organised four consultation events during this stage to answer questions from residents and interested parties. Further details of the consultation process and methods used to engage stakeholders are set out in Appendix B of this document.

1.10 Concurrent to the ELP Regulation 19 Consultation, the council's Journeys and Places Team consulted on two additional documents which also form part of the wider evidence base for the Local Plan.

*Enfield Transport Strategy:* This aims to build on the borough's existing transport links and facilities, whilst providing the platform for future enhancements. The purpose of the Strategy is to steer transport planning and policies for the London Borough of Enfield up to 2041.

*Enfield Place Shaping Framework:* This document will guide the Council's approach to enhancing public spaces and the public realm in Enfield alongside the community. It outlines 11 placemaking areas and details the approach to delivering the broad ambitions for place shaping in the borough.

## Structure of this statement

1.11 This statement of consultation comprises three sections:

- **Section 1** is an introduction.
- **Section 2** sets out the timeline which has been followed in preparing the revised Local Plan which is in accordance with the up to date Enfield Local Development Scheme July 2024.
- **Section 3** summarises the main issues raised during the course of the consultation carried out under Regulation 19 from 28 March to 20 May 2024 by plan chapter. Section 3 is supported by the two Appendices:
    - **Appendix A** - provides a summary of the Regulation 18 consultations undertaken between 2016 and 2021. It also demonstrates how the comments have been taken into account by the Council within a **schedule of changes** between the most recent *Regulation 18* Consultation in 2021 and the *Regulation 19* draft of the local plan.
    - **Appendix B –** further addresses the requirements of *Regulation 22(1)(c)(v)* and sets out **details of the consultation** undertaken at the *Regulation 19* stage. It also provides and a **summary of the main issues** raised in relation to each policy by the *Regulation 20* representations, alongside Council initial response in plan order. Please note that representations from individuals are summarised in Section 3, with the full schedule of representations available online from the council's websitev.

## 2. Enfield Local Plan Production Timeline

2.1 The timetable below outlines the main stages in the preparation of the ELP 2019 – 2041 up until the submission date of 6 August 2024. An account of this process, with links to key documents at each stage, can also be found at this webpage: https://www.enfield.gov.uk/services/planning/new-enfield-local-plan

### Regulation 18 Consultation

#### Growth Scenarios – December 2016

2.2 In 2016, the Council prepared the document '*Consultation on a New Plan for Enfield 2017-2032*', which considered the major issues for the borough including on housing, jobs and community facilities. It also set out a series of spatial options for how the borough could grow and develop over the Plan period. This document underwent public consultation between Friday 18 December and Friday 12 February 2016. The consultation sought views on the Local Plan spatial options and asked for respondents to set out their alternative ideas. The consultation also included a call for sites consultation, requesting submission of locations for development.

#### Issues and Options – December 2018

2.3 From 5 December 2018 to 28 February 2019 the Council consulted on the issues and options for the Local Plan for a second time and also carried out a consultation to identify future development sites. This initial Regulation 18 document focussed on further exploring broad issues and options but did not indicate the Council's preferred approach in terms of the scale of growth to be planned for, or in terms of the proposed spatial strategy.

#### Preferred Approaches – June 2021

2.4 From June to September 2021 the Council consulted on the main issues and preferred approach for the Local Plan and also carried out a consultation to identify the location of future development sites. This additional Regulation 18 consultation was considered necessary to:

- explore those issues identified through the earlier Regulation 18 consultation;
- respond to changes in context, including: government planning policy; the climate and ecological emergencies, COVID-19 Pandemic, and the recently adopted New London Plan;
- reflect the new and updated technical evidence base; and
- identify a preferred spatial growth strategy and preferred policy options.

#### Pre-Publication Period – December 2023

2.5 Whilst not officially a consultation stage, the Council released the draft Plan on 6 December 2023 prior to the formal submission discussion at its Full Council meeting. This enabled the borough's Councillors to use this time to engage with their constituents and discuss aspirations for homes and the environment. This period was not a statutory consultation but enabled officers time to review, consider, and discuss the content of the Local Plan. As a result of this stage, minor revisions were made to the documentation. Explanations of the minor revisions were provided in an appendix

to the Officer Report for Full Council[1]. Accompanying the draft Local Plan release, the Draft Integrated Impact Assessment (IIA) and Draft Habitats Regulation Assessment (HRA) were also published.

### Regulation 19 Consultation Period – March 2024

2.6 The Draft Local Plan Regulation 19 March 2024 was approved for publication for a minimum 6-week period of public consultation by Full Council on 19 March 2024. The Draft Local Plan and supporting documents, including the Integrated Impact Assessment and Habitats Regulation Assessment, were published in accordance with Regulation 19 for a six-week consultation period lasting from 28 March to 20 May 2024. The Council consulted specific consultation and statutory bodies, local residents' groups, businesses and individual residents in accordance with the SCI and organised four consultation events to answer questions from residents and interested parties on how to respond to the consultation. Further details of the consultation process, and who was consulted, are set out in Appendix B below.

### Submission to the Secretary of State – August 2024

2.7 The decision by the Council in March 2024 also included a resolution to submit the Draft Local Plan to the Secretary of State for examination following the conclusion of the pre-submission publication period. This Consultation Statement sets out the Council's consideration of the representations received under Regulation 20 in response to Regulation 19 publication (Appendix 2 Schedule 2).

## 3. Summary of Process and Main Issues

### Summary of the consultation process for Enfield Local Plan 2019-2041

3.1 Public consultation under Regulation 18 of the *Town and Country Planning (Local Plans)(England) Regulations 2012* took place in three stages. **Appendix A Schedule A1** of this document provides further details of the issues raised during the three Regulation 18 Consultation stages in summary format. **Appendix A Schedule A2** then provides a summary of the key changes made in response to comments made on the evidence base leading up to the Regulation 19 consultation.

3.2 The first Regulation 18 stage consultation was undertaken in December 2016 and involved a comprehensive engagement with local communities on potential growth scenarios for Enfield. The consultation document can be found here and began early engagement to set a direction for future stages of work. It set out a series of options for how the borough could grow and develop in the future. The consultation sought views on the Local Plan spatial options and asked for respondents to set out their alternative ideas. The consultation also included a call for sites consultation, requesting submission of locations for development.

3.3 To ensure that all interested parties were given the opportunity to understand and respond to the consultation in late 2018 to early 2019, the Council undertook a comprehensive programme of engagement and consultation relating to the December 2018 "Issues and Options" document, which can be found here. This consultation followed, and in many cases exceeded, the Council's own standards for public engagement as set out in the relevant SCI at that time, adopted in 2015. The full *Consultation Statement* addressing the Issues and Options consultation undertaken between December 2018 and February 2019 a can be found here.

[1] https://governance.enfield.gov.uk/ieListDocuments.aspx?CId=108&MId=14918

3.4 From June to September 2021 the Council consulted on a final main issues and preferred approaches for the Local Plan which can be found here, and also carried out a consultation to identify future development sites. The full Consultation Statement addressing the Preferred Approaches consultation undertaken between June 2021 and September 2021 a can be found here. A full database of all representations made at this stage can also be found here.

3.5 The Council published informally a draft of the *ELP* for information in December 2023 to allow councillors to review the document and to speak to their ward residents. This was followed by a formal *Regulation 19* pre-submission publication for six weeks between March and May 2024. **Appendix B** provides further details of how the requirements of *Regulation 22(1)(c)(v)* have been met, who was consulted, how they were consulted, the number of representations made pursuant to R*egulation 20* and a summary of the main issues raised in those representations. A Council response is also provided to the main issues raised. A high-level summary of the main issues raised at Regulation 19/20 is also given below alongside a summary of the council's governance process for the ELP.

## Summary of the governance process for the Enfield Local Plan 2019-2041

3.6 To oversee the preparation of the ELP a Local Plan Cabinet Sub-Committee was formed. More recently (in 2022) this was replaced by a Cross-Party Working Group (CPWG), that was tasked with considering issues relating to the content of the proposed site allocations in the ELP. Elected Members have been kept informed of progress with the ELP through regular updates at: the Environment Forum, Regeneration and Economic Development Scrutiny Panel, Planning Committees, Cabinet and Full Council. More generally, Members have been briefed and engaged on progress with the ELP through bulletins and bespoke email communications, and through Officer led workshops.

3.7 The key governance and decision-making arrangements for the ELP are summarised below, with further details available in the Spatial Strategy and Overall Approach Topic Paper.

**Table 3.1: Governance and decision-making arrangements for the Enfield Local Plan**

| Stage | Member Input | Approving Body |
|---|---|---|
| Issues and Options Consultation 2015 (Regulation 18) | Requested to approve the Reg 18 Issues and Options Local Plan for statutory consultation. | Local Plan Cabinet Sub Committee (5th November, 2015). Agenda[4] |
| The 'Enfield Conversation' 2018 (Regulation 18) | Requested to approve the Reg 18 Local Plan Growth Scenarios and Call for Sites for statutory consultation. | Local Plan Cabinet Sub Committee (24th October, 2018). Agenda[5] |
| Enfield Local Plan – Main Issues and Preferred Approaches 2021 (Regulation 18) | Requested to approve the Reg 18 Draft Local Plan (with accompanying supporting documents) for statutory consultation. | Council (9th June 2021). Agenda[6] |
| Pre-submission draft ELP 2024 (Regulation 19) | Opportunity for Members to consider a pre-publication draft of the Local Plan 12-weeks prior to the meeting of Council on 6th March 2024. Decision to approve publication draft ELP for consultation and following this consultation, submit the ELP for examination. | Council (March 2024). Agenda[7] |
| Adoption of Local Plan document following receipt of Inspector's Report. | Decision to adopt Plan, following receipt of Inspector's Report and associated Main Modifications. | Cabinet and Council (TBC) |

[1] https://www.enfield.gov.uk/__data/assets/pdf_file/0027/49239/Enfield-Reg-19-IIA-Main-report-Reg-19-Planning.pdf
[2] https://www.enfield.gov.uk/services/planning/evidence-base
[3] https://www.enfield.gov.uk/services/planning/evidence-base
[4] https://governance.enfield.gov.uk/documents/g9545/Agenda%20frontsheet%2005th-Nov-2015%2019.00%20Local%20Plan%20Cabinet%20Sub-Committee.pdf?T=0
[5] https://governance.enfield.gov.uk/documents/b18599/TO%20FOLLOW%20AGENDA%2024th-Oct-2018%2019.30%20Local%20Plan%20Cabinet%20Sub-Committee.pdf?T=9
[6] https://governance.enfield.gov.uk/documents/s87758/PL%2020.145.%20Council%20-%20Reg%2018%20Enfield%20Local%20Plan.pdf
[7] https://governance.enfield.gov.uk/mgCalendarMonthView.aspx?GL=1&bcr=1

## Executive summary of main Issues raised pursuant to Regulation 20 by Plan Chapter

### 1. Responses which did not raise any issues and/or supported the plan

3.8 There were no responses which did not raise any issues or supported the plan without reservations.

### 2. Responses which made reference to the Duty to Cooperate

3.9 Further details of the duty to cooperate process are set out in the in Duty to Cooperate Statement https://www.enfield.gov.uk/services/planning/new-enfield-local-plan.

### 3. Responses which made reference to the Integrated Impact Assessment

3.10 **The Hadley Wood Neighbourhood Planning Forum:** put forward the view that due to a site's historical importance it has not been adequately considered in the Integrated Impact Assessment.

3.11 **Herts & Middlesex Wildlife Trust:** Commented that the impacts of development on biodiversity value have not been properly assessed through the IIA.

3.12 **NHS London Healthy Urban Development Unit:** NHS Hudu support Objective 4 of the Integrated Impact Assessment (IIA) aimed at enhancing health and reducing inequalities but express concerns about the environmental and health impacts of Green Belt developments, such as inadequate GP services and increased car use. HUDU calls for timely planning of new infrastructure and services, recommends NHS consultation on plan updates, and supports the inclusion of health and wellbeing monitoring indicators in the plan for IIA compliance.

### 4. Responses which made reference to the Habitats Regulations Assessment

3.13 **Natural England:** Regarding air pollution and habitat protection from recreational impacts, Natural England acknowledged Enfield's adopted Recreational Mitigation Strategy but stated the draft Local Plan needs to secure a strategic mitigation package for air pollution impacts on designated sites, especially Epping Forest SAC, before it is adopted. The plan also requires a completed air quality assessment for the HRA and should clarify the policy on biodiversity net gain.

3.14 **The Enfield Climate Action Forum:** objected to the strategic mitigation solution agreed with Natural England in relation to the mitigation proposals for specific sites, and suggested the mitigation was not adequate to prevent adverse impacts on Epping Forest SAC.

3.15 **Hertfordshire County Council (HCC):** HCC acknowledged the work that had been undertaken as part of the Habitats Regulations Assessment and agreed that subject to confirmation from Natural England, impacts on sites in Hertfordshire would be limited.

### 5. Responses which made reference to other procedural matters

3.16 Further details of set out in schedule B.3 of this statement.

### 6. Statutory response from the Greater London Authority

3.17 Overall, the GLA emphasises the importance of aligning the ELP with the objectives and policies of the London Plan and offers assistance in addressing the identified issues:

- ***General Conformity with London Plan:*** The draft ELP needs to align with the objectives of the London Plan (LP2021), particularly regarding the protection and enhancement of open spaces, including the Green Belt.
- ***Housing:*** Concerns about the ambitious housing target and reliance on Green Belt release to meet it, as well as the justification for using Government's Standard Methodology in relation to housing need.
- ***Affordable Housing:*** While the 50% affordable housing target is supported, there are issues with treating affordable housing thresholds as targets and the need for clarity on tenure split.
- ***Gypsies and Travellers:*** The need for provisions to meet the housing needs of Gypsies and Travellers alongside other housing needs.
- ***Tall Buildings:*** Lack of clarity and consistency in definitions and regulations regarding tall buildings across different areas of the borough.
- ***Industrial Land:*** Concerns about the release of Green Belt for industrial purposes, the need for more clarity on different types of industrial spaces required, and the necessity to protect existing Strategic Industrial Locations (SIL).
- ***Transport:*** Doubts regarding the feasibility and sustainability of proposed rural placemaking areas, and the need for robust infrastructure and funding strategies.
- ***Green Belt:*** Questions about the justification for releasing Green Belt land, concerns over the suitability of selected sites, and the need to demonstrate exceptional circumstances.

3.18 The schedule of representation summaries contains what appears to be a significant amount of repetition. It would be reasonable to assume that some of this may be because the same representation has been submitted by multiple respondents. However, an automatic analysis of representations made suggests that only up to 50% of the 14,826 representations may represent duplicates of one another. Despite our best efforts, we have been unable to determine from within these how many unique response exist. We have therefore included these representations in the counts as individual representations and provided a summary of the main issues raised in this document. Sum of representations made. Table 2 sets out how many representations have been made to each policy and allocation throughout the Regulation 19 consultation process.

**Table 2: Number of representations made to each policy**

| Name of policy | Number of representations |
|---|---|
| Key diagram | 1 |
| General and whole plan | 66 |
| Spatial Portrait | 4 |
| Vision | 12 |
| Strategic Objectives | 6 |
| SP SS1: Spatial strategy | 1251 |
| SP SS2: Making good places | 26 |
| SP PL1: Enfield Town | 34 |
| SP PL2: Southbury | 8 |
| SP PL3: Edmonton Green | 12 |

| Name of policy | Number of representations |
|---|---|
| SP PL4: Angel Edmonton | 13 |
| SP PL5: Meridian Water | 38 |
| SP PL6: Southgate | 12 |
| SP PL7: New Southgate | 6 |
| SP PL8: Palmers Green | 14 |
| SP PL9: Rural Enfield | 22 |
| SP PL10: Chase Park | 2317 |
| SP PL11: Crews Hill | 2040 |
| SP SE1: Responding to the climate emergency | 10 |
| DM SE2: Sustainable design and construction | 9 |
| DM SE3: Whole-life carbon and circular economy | 7 |
| DM SE4: Reducing energy demand and increasing low carbon energy supply | 11 |
| DM SE5: Renewable energy development | 2 |
| DM SE6: Climate change adaptation and managing heat risk | 5 |
| DM SE7: Managing flood risk | 6 |
| DM SE8: Protection and improvement of watercourses | 5 |
| DM SE9: Sustainable drainage systems | 7 |
| SP SC1: Improving health and wellbeing of Enfield's diverse communities | 8 |
| SP SC2: Protecting and enhancing social and community infrastructure | 12 |
| SP BG1: Enfield's blue and green infrastructure network | 17 |
| SP BG2: Protecting nature conservation sites | 3 |
| SP BG3: Protecting Epping Forest Special Area of Conservation | 7 |
| SP BG4: Biodiversity net gain, landscape restoration and offsetting | 33 |
| SP BG5: Green Belt and Metropolitan Open Land | 9 |
| SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land | 9 |
| SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the Metropolitan Open Land | 16 |
| DM BG8: Protecting open space | 6 |
| DM BG9: Watercourses | 9 |
| DM BG10: Urban greening and biophilic principles | 6 |
| DM BG11: Allotments and community food production | 2 |
| DM BG12: Burial and crematorium spaces | 4 |
| DM BG13: Blue and green infrastructure plans | 6 |
| SP DE1: Delivering a well-designed, high quality and resilient environment | 9 |
| DM DE2: Design process and design review panel | 6 |
| DM DE3: Inclusive design | 2 |
| SP DE4: Putting heritage at the centre of place making | 5 |
| DM DE5: Strategic and important local views | 8 |
| DM DE6: Tall buildings | 1642 |
| DM DE7: Creating liveable, inclusive and quality public realm | 4 |
| DM DE8: Design of business premises | 4 |

| Name of policy | Number of representations |
|---|---|
| DM DE9: Shopfronts and advertisement | 0 |
| DM DE10: Conserving and enhancing heritage assets | 5 |
| DM DE11: Landscape design | 5 |
| DM DE12: Civic and public developments | 1 |
| DM DE13: Housing standards and design | 5 |
| DM DE14: External amenity standards | 2 |
| DM DE15: Residential extensions and outbuildings | 1 |
| SP H1: Housing development sites | 12 |
| SP H2: Affordable housing | 29 |
| DM H3: Housing mix and type | 15 |
| DM H4: Small sites and small housing development | 1423 |
| DM H5: Supported and specialist housing | 4 |
| DM H6: Community led housing | 0 |
| DM H7: Build to rent | 0 |
| DM H8: Large scale purpose built shared housing | 0 |
| DM H9: Student accommodation | 2 |
| DM H10: Traveller accommodation | 6 |
| SP E1: Employment and growth | 30 |
| SP E2: Promoting jobs and inclusive business | 10 |
| SP E3: Strategic Industrial Locations | 15 |
| SP E4: Supporting offices | 4 |
| SP E5: Transforming Industrial Sites | 11 |
| DM E6: Locally Significant Industrial Sites | 5 |
| DM E7: Non-designated industrial sites | 3 |
| DM E8: Providing for workspaces | 5 |
| DM E9: Local jobs, skills and local procurement | 5 |
| DM E10: Fostering a successful evening economy | 0 |
| DM E11: Creating a smart and digitally connected Borough | 1 |
| DM E12: Meridian Hinterlands | 8 |
| SP TC1: Promoting town centres | 5 |
| SP TC2: Encouraging vibrant and resilient town centres | 1 |
| DM TC3: Floorspace above commercial premises | 1 |
| DM TC4: Markets | 0 |
| DM TC5: Meanwhile uses | 0 |
| DM TC6: Managing the clustering of town centre uses | 2 |
| DM RE1: Character of the Green Belt and open countryside | 4 |
| DM RE2: Improving access to the countryside and green corridors | 2 |
| SP RE3: Supporting the rural economy | 3 |
| DM RE4: Farm diversification and rural employment | 2 |
| SP CL1: Promoting culture and creativity | 2 |
| DM CL2: Leisure and tourism | 3 |
| DM CL3: Visitor accommodation | 2 |
| SP CL4: Promoting sporting excellence | 17 |

| Name of policy | Number of representations |
|---|---|
| DM CL5: Sport, open space and recreation | 8 |
| DM CL6: Protecting and attracting public houses | 2 |
| SP T1: A sustainable and decarbonised transport system | 22 |
| DM T2: A healthy and connected Enfield | 13 |
| DM T3: Constructing a vibrant and safe Enfield for everyone | 5 |
| DM ENV1: Local environmental protection | 8 |
| SP D1: Securing contributions to mitigate the impact of development | 13 |
| DM D2: Masterplans and Design Codes to achieve comprehensive development | 0 |
| DM D3: Infrastructure and phasing | 6 |
| DM D4: Monitoring and review | 3 |
| Appendix A: Evidence base | 20 |
| Appendix B: Key Performance Indicators | 3 |
| **Appendix C: Site Proformas - Subtotal** | **5296** |
| SA1.1: Palace Gardens Shopping Centre | 13 |
| SA1.2: Enfield Town Station and Former Enfield Arms | 10 |
| SA1.3: Tesco, Southbury Road | 9 |
| SA1.4: Enfield Civic Centre | 7 |
| SA1.5: St Anne's Catholic High School for Girls | 5 |
| SA1.6: 100 Church Street | 4 |
| SA1.7: Oak House, 43 Baker Street | 1 |
| SA2.1: Colosseum Retail Park | 8 |
| SA2.3: Morrisons, Southbury Road | 4 |
| SA2.4: Southbury Leisure Centre | 10 |
| SA2.5: Tesco, Ponders End | 3 |
| SA2.6: Sainsburys, Crown Road | 5 |
| SA3.1: Edmonton Green Shopping Centre | 10 |
| SA3.2: Chiswick Road Estate | 4 |
| SA3.3(URB.24): Fore Street Estate | 1 |
| SA4.1: Joyce Avenue and Snells Park Estate | 6 |
| SA4.2: Upton Road and Raynham Road | 5 |
| SA4.3: Langhedge Lane Industrial Estate | 3 |
| SA4.4: South-east corner of North Middlesex University Hospital Trust | 4 |
| SA4.5: Public House, 50-56 Fore Street, London | 5 |
| SA5.1: Meridian Water Phase 1 | 11 |
| SA5.2: Meridian Water Phase 2 | 12 |
| SA5.3: Former IKEA store, Glover Drive | 7 |
| SA5.4: Tesco Extra, Glover Drive | 6 |
| SA5.5: Meridian 13 (also known as Teardrop) | 8 |
| SA5.6: Meridian East (also known as Harbet Road) | 8 |
| SA6.1: Southgate Office Village | 5 |
| SA6.3: Michenden Car Park and Alan Pullinger Centre | 7 |
| SA7.1: Former Gasholder, New Southgate | 6 |
| SA7.2: Aldi, New Southgate (formerly Homebase) | 4 |

| Name of policy | Number of representations |
|---|---|
| SA7.3: Ladderswood Estate | 8 |
| SA7.4: Arnos Grove Station Car Park | 6 |
| SA7.5: Coppice Wood Lodge | 3 |
| SA8.1: Morrisons, Palmers Green | 7 |
| SA8.2: Lodge Drive Car Park | 8 |
| SA8.3: Corner of Green Lanes and the North Circular | 5 |
| SA8.4: Travis Perkins, Palmers Green | 5 |
| SA10.1: Land at Chase Park | 913 |
| SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west) | 13 |
| SA10.3: Chase Park North East | 11 |
| SA10.4: Chase Park North West | 12 |
| SA11.1: Land at Crews Hill | 19 |
| SA11.2: Land South of Cattlegate Road, Crews Hill | 14 |
| SA11.3: Land South of M25, Crews Hill | 26 |
| SA11.4: Land North and South of Cattlegate Road | 10 |
| SA11.5: Land East of Theobalds Road Park, Crews Hill | 14 |
| SA11.6: Land South West of Theobalds Park Road | 11 |
| URB.01: Land known as Brimsdown Sports Ground | 7 |
| URB.02: Cockfosters Station Car Park | 12 |
| URB.03: Former Chase Farm Hospital | 263 |
| URB.04: Blackhorse Tower, Cockfosters Road | 2 |
| URB.05: New Avenue Estate | 3 |
| URB.06: Former Middlesex University, Trent Park | 2 |
| URB.07: Sainsburys, Green Lanes | 28 |
| URB.08: Hoe, Eastfield, Cherry and Bouvier Estates | 4 |
| URB.09: Exeter Road Estate | 4 |
| URB.10: Alma Estate | 7 |
| URB.11: The Former Royal Chace Hotel | 3 |
| URB.12: 241 Green Street | 6 |
| URB.13: Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate | 5 |
| URB.14: Four Hills Estate, Lavender Hill | 3 |
| URB.15: Kettering Road Estate | 5 |
| URB.16: 188-200 Bowes Road | 4 |
| URB.17: Main Avenue Site | 3 |
| URB.18: Land at Ritz Parade | 5 |
| URB.19: Albany Leisure Centre and Car Park | 5 |
| URB.20: Cuckoo Hall Lane Estate | 4 |
| URB.21: Moorfield Health Centre | 6 |
| URB.22: Oakwood Station Car Park | 241 |
| URB.23: Stoneleigh Avenue Estate | 5 |
| URB.24: Fore Street Estate | 3 |
| URB.25: Pevency Avenue | 4 |

| Name of policy | Number of representations |
|---|---|
| URB.26: Fords Grove Car Park | 14 |
| URB.27: South Street | 4 |
| RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road | 11 |
| RUR.02: Land between Camlet Way and Crescent West, Hadley Wood | 2627 |
| SA2.2: Heritage House | 8 |
| SA2.7: Crown Road Lorry Park | 4 |
| SA2.8: Land and buildings north of Lincoln Road | 4 |
| SA5.7: Ravenside Retail Park | 10 |
| SA5.8: Kenninghall Metals and Waste | 3 |
| SA5.6: Meridian East (also known as Harbet Road) | 8 |
| URB.32: Claverings Industrial Estate | 3 |
| URB.28: Land and buildings south east of Stockingswater Lane | 7 |
| URB.29 Land to the south of Milmarsh Lane, Brimsdown Industrial Estate | 5 |
| URB.33: 6 Morson Road | 1 |
| URB.30: Montagu Industrial Estate | 8 |
| URB.31: Snowbird Foods Extension | 5 |
| URB 32: Claverings Industrial Area | 3 |
| URB 33.6: Morson Road | 3 |
| URB.35: Riverwalk Business Park | 4 |
| URB.34: 5 Picketts Lock Lane | 5 |
| RUR.03: Land west of Rammey Marsh | 228 |
| RUR.04: Land east of Junction 24, M25 | 304 |
| RUR.05: Land to the north west of Innova Park | 12 |
| SA6.2: Barnet and Southgate college | 3 |
| URB.36: Church Street Recreation Ground | 40 |
| RUR.06: Land at Picketts Lock | 8 |
| RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane | 28 |
| RUR.08: Sloemans Farm | 6 |
| RUR.09: Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane | 0 |
| Omission sites | 28 |
| Appendix D: Tall Building | 3 |
| Appendix E: Developer Contributions | 2 |
| | |
| **Grand Total** | **14,826** |

## 7. Other responses by Plan Chapter

### Chapter 2: Good Growth in Enfield

3.19 **Greater London Authority (GLA):** The draft ELP needs to align with the objectives of the London Plan (LP2021), particularly regarding the protection and enhancement of open spaces, including the Green Belt set out in London Plan Policy GG2: Making the best use of land.

3.20 **Transport for London (TFL):** TFL acknowledged the work that had been done to embed active travel considerations in the spatial strategy but highlighted the need for more detailed infrastructure delivery plans and coordinated masterplans and supplementary planning documents to delivery these, as well as some changes to wording in Policy SS2: Making Good Places.

3.21 **National Highways:** National Highways' response notes that the Local Plan's strategic vision and spatial strategy align with sustainable development principles. However, they raise concerns about a proposed new logistics hub near Junction 24 of the M25, which could increase commuting and commercial traffic along the M25.

3.22 **Historic England:** Historic England commended the Council's efforts to create well-designed, high-quality environments that respect the historic context but raised concerns around the wider approach to tall buildings. This is considered in more detail below.

3.23 **Natural England:** Natural England welcomes the Local Plan's aim to make Enfield "A deeply green place," focusing on enhanced biodiversity, climate crisis mitigation and adaptation, and the ambition to become a carbon-neutral Borough.

3.24 **Hertsmere Borough Council:** Acknowledgement of the challenges in setting a housing target and the necessity of some Green Belt land release. Commendation for Enfield's approach to affordable housing, aiming for 50% genuinely affordable homes. Concern about the impact on the Green Belt and the need to demonstrate exceptional circumstances.

3.25 **Welwyn Hatfield Borough Council:** Recognises the constraints Enfield faces and express willingness to engage under the Duty to Cooperate. Notes that the stepped trajectory will further add to pressure for development in Welwyn Hatfield in the early years of the plan period and highlights the work that has been undertaken to release substantial areas of Green Belt Land to meet housing needs resulting from London's out-migration. Highlights the results of the Standard Method for assessing housing need in Enfield.

3.26 **Other London Borough Councils:** The London Boroughs of Haringey and Barnet acknowledge the spatial strategy and Green Belt release proposed, with Haringey supporting the designation of placemaking areas, and Barnet welcoming the approach to Enfield's housing target in the plan. Emphasising ongoing engagement, Haringey stresses the need for detailed information on transport and highways impacts from Meridian Water, as many journeys will pass through Haringey, requiring improvements within Haringey. They reiterate the importance of mitigating any transport impacts through joint working and have no comments on other identified sites. LB Barnet noted that the additional traffic flows modelled should not cause undue concern at this stage.

3.27 **Lee Valley Regional Park Authority (LVRPA):** The LVRPA support the spatial vision to establish a high quality, biodiverse and green environment for the well-being and enjoyment of Enfield's residents, employees and visitors. However, they suggest that to ensure the Local Plan is positively prepared and effective the potential of the

Regional Park within Enfield should be captured by adding a reference to the Regional Park under the Vision theme ‘A Deeply Green Place’.

3.28 **Enfield Conservative Group:** The Enfield Conservative Group asserts that the Draft Plan contradicts national and regional guidelines on Green Belt use, lacking the necessary evidence of exceptional circumstances required for such developments. They argue that the Draft Plan's projected housing growth numbers are unsubstantiated, as they are not supported by current demographic trends showing a decrease in London's population and contend that the Draft Plan's proposals threaten conservation areas, heritage assets, and important vistas. The group argues that transport issues should have been addressed in the Local Plan, not post-finalization. They emphasise that new developments in these areas won't meet the London Plan's target of 75% non-car trips by 2041 due to poor connectivity and lack of local employment. The group argues that not all avenues for housing supply have been explored, particularly brownfield sites, and that the plan ignores public concerns. They claim the plan unfairly targets Conservative wards for Green Belt development and high-density projects, benefiting the Labour administration politically.

3.29 **Enfield Climate Action Forum (EnCaf):** The EnCaf Land Use Working Group (ELUWG) finds Policy SS1 (Spatial Strategy) non-compliant with relevant legislation and not meeting the tests of soundness. They highlight that the ELP (ELP) should conform to the London Plan 2021 (LP21), which sets a minimum housing requirement of 18,271 additional homes by 2040/41. ELUWG notes discrepancies in the housing target numbers within the ELP, ranging from 33,280 to 34,710 homes, and emphasizes that brownfield/urban sites alone can exceed the LP21 housing requirement, questioning the need to de-designate Green Belt land. The group points out that the ELP underestimates the potential of brownfield/urban sites and has not fully explored these options before proposing Green Belt development. They argue that the ELP's focus on unsustainable Green Belt locations contradicts national policy directives for effective land use and sustainable development. ELUWG also raises concerns about the accuracy and completeness of the Housing and Economic Land Availability Assessment (HELAA) data, the delivery of affordable housing, and the need for family homes in sustainable urban locations. They suggest that the spatial strategy should be revised to better reflect the LP21's housing requirements and promote sustainable development without encroaching on the Green Belt.

3.30 **Enfield Road Watch:** Enfield Road Watch state that beyond 2029, paragraph 4.1.11 of the London Plan refers to local evidence of identified capacity. It is clear that the 'local capacity' referred to means brownfield sites, rather than historic landscapes such as Enfield Chase, which are strongly protected. If it is not possible to accommodate more development beyond 2029, then the only legal way forward is to comprehensively review and re-examine the London Plan, so that the least harmful development sites across the London housing market area can be selected for development, or the housing requirement can be reduced if it is not possible to achieve sustainable development. In fact that is unlikely to be necessary in Enfield because Meridian Water and other regeneration sites identified as the basis of the Enfield number in Table 4.1 have recently started to deliver, behind the schedule anticipated in the London Plan SHLAA, and will continue into the 2030s.

3.31 **Campaign to Protect Rural England (CPRE) London:** CPRE London suggest that the council has used an insupportable, false argument which cannot justify Green Belt release i.e. – that higher housing ‘targets’ can be accommodated if Green Belt land is released. But this line of argument implies targets are to be set in relation to land availability not as a response to need within the context of land availability. We do not believe this argument holds any water legally, it is an unjustifiable position and makes the plan unsound. The National Planning Policy Framework (NPPF) does not justify

Green Belt release solely for housing needs. There is sufficient brownfield land available in the borough to meet housing targets, making Green Belt release unnecessary and counterproductive. Releasing Green Belt land would harm London's environment, contributing to urban sprawl, car dependency, and loss of green spaces and ecosystems. Developing Green Belt land requires extensive infrastructure investment, diverting funds from building affordable homes and essential amenities.

3.32 **Summary of other responses:** Numerous respondents suggested that the approach to setting a housing target in the plan, particularly in the period after 2028/29, was not sound or in conformity with the London Plan, and that the case for releasing Green Belt was not sound. This is addressed in more detail below in the summary for 6 Chapter Blue and Green Infrastructure. Other respondents including a number of developers and landowners and the Home Builders Federation agreed with the approach to the Spatial Strategy, including in terms of housing, employment space, and town centres. These respondents supported the approach to setting the housing target and the case for exceptional circumstances including Berkeley Homes North East London Ltd. There were some concerns expressed by respondents around the requirements set out in SS2: Making Good Places, particularly the requirement for master planning to take place on larger sites.

## Chapter 3: Placemaking areas

### *SP PL1: Enfield Town*

3.33 **Historic England:** Historic England suggest that additional views should be considered in the context of Gentlemen's Row, which contains a very important group of listed buildings representing some of the earliest development of Enfield Town. Many of the current views face west or are located close to the southern side of the gardens. We would recommend further views are considered particularly looking east and south east from the gardens and the upper section of Gentlemen's Row, showing the potential impact on the skyline over the rooftops of the listed buildings resulting from potential development of Palace Gardens and the Enfield Civic Centre. It should be noted that the viewing positions/directions given in this document will guide the scope of any visuals supporting future applications for development, so it will need to fully illustrate the potential visual impacts on heritage assets.

3.34 **National Highways (General Comment):** National Highways' response emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25.

3.35 **Transport for London (TFL):** Transport for London welcome the added reference in part 5 to major developments contributing towards cycling infrastructure through and around the placemaking area. It would be helpful to refer to contributions towards bus stops and crossings which could benefit from improvement. Although we welcome the added reference to car parking in part 9, we recommend that the wording should be amended to read: 'development should minimise the amount of car parking spaces as well as the negative impacts of car parking and servicing.'

3.36 **Places for London – The TFL Property Company:** Places for London, TFL's property development arm, welcome the Borough's inclusion of Enfield Town Station within the Enfield Town Placemaking Area. We also commend the encouragement of tall buildings in this area but recommend that Supporting Paragraph 3.20 is reworded.

3.37 **Better Homes Enfield:** Better Homes Enfield's response highlights missed opportunities for land assembly and site optimization in the draft ELP , making it unsound and not compliant with the NPPF and London Plan. They emphasize the importance of integrating additional sites to maximize housing potential and better use of space. Specifically, they promote 10 sites in the area, some of which are included in the plan.

### *SP PL2: Southbury*

3.38 **National Highways:** As above

3.39 **Transport for London (TFL):** Transport for London welcome the addition of the statement: 'Contributions will also be sought to increase station capacity and to improve station access.' Gateline capacity could be increased within the existing station. However, step free access may need a wider reconfiguration of the station, and at least access to land adjacent to the station.

3.40 **Sport England**: Sport England support the strategic placemaking policy addressing enhancements to nearby open spaces including Enfield Playing Fields and St.

George's Playing Fields, however there is no up-to-date evidence to support what enhancements need to take place at these playing fields to support the increase in population from the place expansion.

3.41 **BL Logistics Investment Limited (British Land):** BL Logistics Investment Limited (British Land) broadly supports the Council's Southbury Placemaking Vision and the aim for intensification within the Great Cambridge Road Industrial Estate. However, they suggest the vision should encompass the entire Great Cambridge Road Industrial Estate/ Martinbridge Trading Estate SIL/IBP and that co-location should only be promoted in exceptional circumstances within SIL. British Land supports Draft Strategic Policy PL2's aim to enhance placemaking in Southbury and safeguard the Great Cambridge Road Industrial Estate/ Martinbridge Trading Estate SIL/IBP for industrial use. They recommend that Policy PL2 should clarify that placemaking principles are intended to guide development, where practically feasible, rather than serve as strict criteria. BL Logistics Investment Limited (British Land) comments on the De Mandeville Retail Park site, noting it is not proposed for site allocation and has no policy designation under the Draft Local Plan, classifying it as "white land." Therefore, the Local Plan and Development Management policies should maintain flexibility for the site to support either land use allocation over time.

3.42 **SEGRO:** supports the general direction of Policy PL2, especially the requirement for residential proposals near Strategic Industrial Locations (SIL) not to compromise industrial operations. However, SEGRO is concerned that policies PL2 and E3 could mandate intensification and increased floorspace/job density within SIL areas, which might not always align with specific business needs or site characteristics. They emphasize the importance of flexibility in these policies, considering the diverse requirements of logistics and distribution businesses, the high costs and challenges of multi-level warehousing, and alternative measures of industrial intensification beyond just increasing floorspace.

3.43 **Places for London – The TFL Property Company:** welcome the Borough's inclusion of Enfield Town Station within the Enfield Town Placemaking Area. We also commend the encouragement of tall buildings in this area, but recommend that supporting Paragraph 3.20 is reworded to incorporate the following: 'To accommodate growth, an increased number of tall buildings will be incorporated, and encouraged around railway stations in Enfield Town'. Housing delivery on station car parks provide the opportunity to reduce car-dependency and encourage the shift to sustainable travel in London, which falls in line with London Plan Policy HI and DI encouraging higher density development to be located in areas with high transport accessibility.

***SP PL3: Edmonton Green***

3.44 **Environment Agency:** Suggested minor amendments to strengthen the policy.

3.45 **Historic England:** Historic England welcome the text in clause 2 that requires new development to preserve key views of the Grade II* listed tube station. The policy should also ensure appropriate conservation of a highly important heritage asset through reference to significance. Suggested change: 2. … development that preserves and enhances the significance of the station, including key views.

3.46 **National Highways:** As above

3.47 **Transport for London:** Transport for London welcome the changes made to this policy in response to TfL comments, including a reference to contributions towards public transport and positive support for car free developments in part 8. We strongly support the addition of part 8d 'to retain a bus station with improved pedestrian linkage between it, the high street and the station' and part 9 'must encourage a modal shift in

the area through reduction of car parking and improvements to walking, cycling and public transport infrastructure' and the statement in part 10c that 'Any changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity.' We have provided detailed requirements for the bus station and we have agreed changes to the town centre highway links to allow local re-routing of buses

***SP PL4: Angel Edmonton***

3.48 **National Highways:** As above

3.49 **Sport England: Sport England note** the vision mentions the provision of new recreation facilities including the Selby Centre's regeneration emerging into a park and sports facilities, however the Strategic Policy SP PL4 appears silent on sport and recreation facilities therefore would the policy be sufficient to achieve the vision? In addition, as noted above, Sport England considers that the vision/policy should be directed by the councils up-to-date Playing Pitch Strategy or Built Facilities Strategy.

3.50 **Transport for London (TFL):** Transport for London note and welcome changes to the placemaking vision that emphasise active travel corridors rather than new rapid transport which is unlikely to be viable within the current Local Plan timescales. Superloop route SL1 provides some of these benefits but we also need complementary measures to support its introduction, such as bus priority and improved bus infrastructure.

3.51 **Telereal Securitised Properties GP Limited:** Telereal Securitised Properties GP Limited strongly supports Draft Policy PL4's identification of Angel Edmonton as a Placemaking Plan area, emphasizing the need for investment and flexibility in housing typologies. They advocate for the inclusion of their site at Sterling Way, adjacent to the railway line and Silver Street Overground Station, for residential-led redevelopment, capable of delivering 180-200 homes. They recommend the site be added to Appendix C and Draft Policy H1, aligning with the Council's housing needs and strategic vision for Angel Edmonton.

***SP PL5: Meridian Water***

3.52 **Transport for London:** Transport for London are pleased to see that paragraph 3.68 (page 66) includes a commitment to the masterplan approach to ensure consistency across Meridian Water, which will be required for comprehensive infrastructure and flood risk planning.

3.53 **Environment Agency:** The Environment Agency recommend that the 'Green Infrastructure' policy point is expanded to 'Green and Blue Infrastructure' to acknowledge the high number of watercourses within the site and their significance for the Meridian Water project. Further to this, we strongly recommend a standalone policy point on Flood Risk to acknowledge the complex flood risk issues at Meridian Water. We suggest that there is also a specific policy point for groundwater and land quality. We also recommend that point 8 makes a clear distinction between fluvial and surface water flood risk. EA advise the water bodies present in the vicinity of specific developments and place policies be mentioned in the site allocation documentation. We strongly recommend that the place policies which have rivers incorporate wording that encourages, and/or requires river restoration and naturalisation.

3.54 **National Highways:** As above

3.55 **Lee Valley Regional Park Authority (LVRPA):** The LVRPA notes there have been some minor amendments to Policy PL5 Meridian Water and maintains its previous

support for this policy and the Placemaking vision for Meridian Water. The detailed policy guidance for this area is welcomed in particular the amended points relating to the delivery of green corridors, public open space and the requirement for development to contribute to the naturalisation and ecological enhancement of existing waterways.

3.56 **London Borough of Waltham Forest:** London Borough Waltham Forest's (LBWF) response to PL5 Meridian Water highlights the opportunity for enhanced recreational facilities at Banbury Reservoir, emphasising the need for improved connectivity between the boroughs, as the reservoir infrastructure is in Waltham Forest and operated by Thames Water. They stress the importance of active travel connectivity for job opportunities and suggest including routes into Haringey and Waltham Forest on the map. Additionally, they recommend ensuring public routes and spaces are safe for women and girls at all times. LBWF calls for collaboration to enhance connectivity and safety measures in the Local Plan to benefit residents across boroughs. Continued cooperation between Waltham Forest and Enfield is crucial for developments within Meridian Water (PL5), including the industrial-led regeneration of Meridian East, the 'Meridian Hinterlands,' and adjacent sites. This includes Waltham Forest's consultation on industrial masterplanning as outlined in paragraph 9.88. Waltham Forest confirms, per paragraph 9.22, that it cannot accommodate industrial capacity to meet Enfield's identified need.

3.57 **Canal & River Trust:** The Canal and River Trust state that the council's Meridian West Supplementary Planning Document should be referenced within the LP. Further clarity should be provided in relation to the creation of 'canals and waterways' so that the expectations can be better understood. Canals would usually be navigable by boats, if that is the intention then detailed information on matters such as water resource, future maintenance, management, and ownership responsibilities would need to be clearly identified. *Policy PL5: Part 8* - refers to naturalisation and ecological enhancements for river naturalisation. As we have stated previously, significant rewilding and /or naturalisation is highly unlikely to be achievable on the RLN, given its function as a navigable waterway. This should be caveated within the policy and clearly referenced within the supporting text for this policy. The Trust should be acknowledged as a key stakeholder in any proposals for use of the RLN for watersports. The trust note that policy should include specific reference to improving the towpath along the RLN.

3.58 **Sport England:** Sport England note there is indication of 10,000 homes to be delivered as part of this place expansion, however there is no indication of specific playing field land to be delivered or enhancements to existing playing fields in the local vicinity. With considerable growth in an area brings demand for additional sport and physical activity provision or upgrades to existing sport facilities and playing fields in the local area. Sport England would like to see specific wording around providing a designated space for playing fields to accommodate for the increase in population and backed up by council evidence.

3.59 **Prologis for Ravenside Retail Park:** Prologis supports the overall goal of Policy PL5 but raises concerns about new pedestrian, cycle, and vehicle routes potentially disrupting operational industrial and logistics sites. Prologis contends that requiring another masterplan is redundant, could delay development, and lacks clarity on responsibility. They suggest deleting the masterplan requirement from subparagraph 1 to avoid duplication and streamline the policy. Prologis contends that subparagraph 7 of Policy PL5, which requires 30% of development area as open public space, is too generic and does not account for the operational needs of industrial and logistics uses. They argue that this policy could hinder the viability of such developments and suggest it should specifically apply to residential and other suitable developments. Prologis

supports the policy's aim to generate high-quality permanent jobs but finds the requirement for 25% local labour unclear and potentially onerous.

3.60 **Meridian Water (LBE):** The Meridian Water team supports the need for a bespoke placemaking policy given the scale of change at Meridian Water. However, to ensure effectiveness, they suggest minor updates for deliverability over the Plan period. They welcome further dialogue with the LPA to refine the context, placemaking vision, and accompanying diagram. They propose changes to ensure office provision at Meridian Water (part 3) is subject to market and viability assessments at the planning application stage for deliverability. They propose changing the term 'green loop' to 'green network' (part 6) to better reflect the diversity of open space typologies and their connections and revisiting the 30% open space minimum requirement at each phase (part 7) to promote a site-wide ambition for comprehensive green infrastructure. And they propose deleting the requirement for new open spaces on either side of the A406 (part 10) and allowing future masterplanning to determine the appropriate quantum of high-quality, multifunctional open space.

3.61 **Better Homes Enfield:** Better Homes Enfield's response to policy PL5 highlights several key issues: the proposed housing numbers and site optimization fall short of potential, there is a lack of clarity on affordable housing and housing mix, the provision of open space is inadequate, active travel needs are insufficiently addressed, employment targets and benefits for local people are unclear, and monitoring mechanisms are inadequate. They suggest revising site allocations, clearly defining housing requirements, specifying open space provisions, improving connectivity, providing detailed employment plans, enhancing monitoring with comprehensive KPIs, and clarifying the status of existing strategies. These modifications would align policy PL5 with the London Plan and national policies, ensuring it is sound and effective.

3.62 **Enfield Climate Action Forum:** The EnCaf Land Use Working Group (ELUWG) supports the regeneration of Meridian Water but argues that Policy PL5 is not legally compliant or sound, though it could be with major modifications. They emphasize that the Habitats Regulations Assessment (HRA) required by the Conservation of Habitats and Species Regulations 2017 has inadequately assessed the potential impact of the increased housing numbers proposed for PL5 on nearby protected sites, such as the Epping Forest Special Area of Conservation (SAC). The HRA was based on an outdated housing number (5,658 homes) instead of the current projection (6,711 to 10,000 homes),and did not adequately consider the adequacy of new open spaces. Additionally, the ELUWG argues that PL5 does not meet the National Planning Policy Framework (NPPF) requirements for sustainable development, as it lacks sufficient provision for green infrastructure and fails to address the substantial local deficit in open space. They highlight that the proposed new park, Edmonton Marshes, is insufficient in size and quality relative to the needs of the expected population. ELUWG also questions PL5's compliance with the London Plan, which mandates appropriate planning for future open space needs in areas of substantial change. They recommend modifications to ensure that PL5 aligns with national and regional policies, and adequately addresses green space needs.

***SP PL6: Southgate***

3.63 **Historic England:** Historic England welcome the text in clause 2 that requires new development to preserve key views of the Grade II* listed tube station. The policy should also ensure appropriate conservation of a highly important heritage asset through reference to significance. Views need to be considered from the terrace outside the café within the Grade II* Registered Park and Garden of Grovelands Park. This raised area affords significant views looking west over the park and of the Grade I

listed Nash villa. These views are an integral part of the significance of both heritage assets. We would be likely to object to any development that appears in those views.:

3.64 **National Highways:** As above

3.65 **Transport for London (TFL):** Transport for London welcome the changes made in response to TfL's comments including the addition to part 7 of a reference to cycling infrastructure and the statement that 'Development proposals and changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity.' We also strongly welcome the amended statement in part 8 that development proposals 'must contribute towards enhancing the pedestrian environment and reduce the reliance on surface car parks, working towards car-free development.'

3.66 **London Borough of Barnet:** LB Barnet Notes that Policy PL6 recognises the importance of Southgate Town Centre, a significant part of whose catchment lies within LB Barnet. LB Barnet supports the town centre's renewal but stresses the need to consider the impact on the character of the adjacent low-rise suburban housing, much of which is in Barnet. They emphasise that the form and siting of tall buildings should be a significant consideration, a point not clarified in Policy PL6 of the Reg 19 draft Local Plan. Policy PL6 mentions exploring the need for a coordinating plan, possibly as a Supplementary Planning Document (SPD), to support Southgate's placemaking vision. While Barnet welcomes this approach, they recommend adding a requirement that neighbouring areas within LB Barnet and LB Enfield be considered in terms of design impact and town centre catchment, to support the town centre hierarchy identified in the London Plan.

3.67 **Asda Stores Ltd:** Savills, on behalf of Asda, supports the Placemaking Vision for Southgate as a thriving District Centre and the specific policy for Southgate, including the identification of Asda's store within the District Centre boundary. They recommend clarifying the placemaking diagram to avoid ambiguity. While supporting enhancements to the pedestrian environment and reducing surface car parks, Savills emphasizes the need for appropriate vehicular parking for food shopping. They also suggest amending Strategic Policy TC2 to include "where appropriate to do so" for Criteria 2 requirements, acknowledging that minor developments might not contribute to all policy matters. Additionally, Asda welcomes engaging with the Council on a future SPD to support the placemaking vision.

3.68 **The Enfield Conservative Group:** The Councillor for Southgate Ward highlights a contradiction in the Plan, which suggests removing office space at Southgate Office Village to create more homes, while simultaneously advocating for increased office space and commercial units in Southgate for a nighttime economy. They noted that this inconsistency has fuelled ongoing resident opposition and remains a contentious issue despite the planning application's prior approval. The Councillor for Southgate Ward expressed concerns that the plan allows buildings up to 30 meters high, which contrasts sharply with Southgate's existing low-density, low-rise houses. They emphasised that this would drastically alter the skyline and overall image of Southgate, negatively impacting views and the setting of the historic Charles Holden-designed station. The Councillor for Southgate Ward noted that the Local Plan's emphasis on prioritising active travel and car-free development has sparked outrage among residents. They highlighted particular concerns from disabled residents about the challenges this poses to their mobility and ability to navigate the borough.

3.69 **Residents/Businesses:** A small number of residents objected to the proposed maximum building heights in the placemaking area stating these would not be in keeping with the existing character.

***SP PL7: New Southgate***

3.70 **Environment Agency:** The Environment Agency advise that the water bodies present in the vicinity of specific developments and place policies be mentioned in the site allocation documentation. We strongly recommend that the place policies which have rivers incorporate wording that encourages, and/or requires river restoration and naturalisation (PL3, PL4, PL5, PL7, PL8, PL9, PL10 and PL11).

3.71 **Historic England:** Historic England state that the projection of new development over the rooftop silhouette of the former Friern Hospital is considered harmful to its architectural significance and setting. This is a well composed expansive and symmetrical composition. Details can be found at: https://historicengland.org.uk/listing/the-list/list-entry/1078848.

3.72 **London Borough of Barnet:** LB Barnet note that the Main Modifications to their own draft Local Plan do not identify New Southgate as an area for tall buildings due to insufficient supporting evidence. LB Barnet will continue collaborating with LB Enfield to ensure a comprehensive, master-planned approach to New Southgate, aligning with Barnet's Policy GSS09. The Statement of Common Ground indicates both Barnet and Enfield support and promote this potential. This is reflected in Enfield's draft policy T1, which states that new development will safeguard land and buildings to facilitate active travel, public transport, and future infrastructure projects, including Crossrail 2. Additionally, Policy PL7 envisions New Southgate as an enhanced gateway with improved connections to Enfield and neighbouring boroughs, a development welcomed by LB Barnet.

3.73 **National Highways:** As above

3.74 **Residents/Businesses:** Residents object to the development of tall buildings based on outdated housing need figures derived from 2014 population projections, which are significantly overstated compared to the latest 2021 census data and projections for Enfield. The actual population has decreased in recent years, and the GLA's projections show an increase of only about 10,000 people from 2021 to 2041, versus the 51,000 stated in the ELP. This overestimation leads to an inflated housing need figure of around 34,000 homes. Residents argue that using more relevant and recent data would provide a more accurate housing need figure, potentially negating the necessity for tall buildings and high-density housing. They also express concerns that proposed tall buildings around Southgate Circus, with heights up to 30 meters, are unsympathetic to the area's character and will impact privacy by overlooking gardens, thus negatively changing the area's character.

***SP PL8: Palmers Green***

3.75 **Environment Agency:** The Environment Agency advise the water bodies present in the vicinity of specific developments and place policies be mentioned in the site allocation documentation. We strongly recommend that the place policies which have rivers incorporate wording that encourages, and/or requires river restoration and naturalisation (PL3, PL4, PL5, PL7, PL8, PL9, PL10 and PL11).

3.76 **Historic England:** Historic England suggest that the policy should include an objective relating to the removal of Broomfield Park from the Heritage at Risk register to ensure consistency with policies elsewhere (e.g. Policy PL3 Edmonton Green). Suggested change: Amendment to ensure consistency with PL3.

3.77 **National Highways:** As above

3.78 **NHS London Healthy Urban Development Unit:** The NHS London Healthy Urban Development Unit supports additional housing in Palmers Green, noting that development is expected within 5-10 years. They suggest including an additional point on the need to contribute to health provision to emphasize the importance of health and wellbeing.

3.79 **Transport for London (TFL):** TFL welcome part 7 which states that development proposals 'should contribute towards improving and enhancing cycling and pedestrian accessibility to support sustainable travel patterns'.

***SP PL9: Rural Enfield***

3.80 **Historic England:** Historic England state that it is clear that intensification of use of green space will follow from the proposed development, including that of Trent Park, which is both a conservation area and a registered park and garden. Contributions towards a management plan for the park should be required so that this increased use can be planned for and mitigated. Suggested change: Include requirement that development proposals make contributions towards conservation area/registered park and garden management plan.

3.81 **Lee Valley Regional Park Authority (LVRPA):** The Park Authority recommends amendments to Policy PL9 Rural Enfield to further recognise the statutory role of the park authority and its Park Development Framework Area Proposals which form part of the Local Plan. To be considered sound i.e. positively prepared and justified a policy statement in support of the Regional Park and the Park Development Framework should be included in the Local Plan. Riparian authorities such as Enfield are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)). The Authority has adopted detailed proposals for those areas of the Regional Park which lie within the London Borough of Enfield through the Park Development Framework Area Proposals. Two sets of Area Proposals are relevant given the extent of Park in the borough: Area 4 The Waterlands: Banbury Reservoir to Pickett's Lock, and Area 5 The Waterlands: King George V Reservoir to Rammey Marsh.

3.82 **NHS London Healthy Urban Development Unit:** The NHS London Healthy Urban Development Unit supports the emphasis in Policy PL9 on landscape restoration, active travel initiatives, climate resilience initiatives, food growing areas and gardens, eco-tourism and leisure activities, and biodiversity offsetting.

3.83 **Canal and River Trust:** Para 3 states that '*Projects which solely provide for habitat creation, biodiversity net gain, carbon sequestration or other forms of environmental benefit, particularly those which can be sold on, will be resisted unless there are demonstrable local public benefits*.' The reasoning for this is not clear. There does not seem to be any detailed guidance as to what would be considered a local public benefit and there may be the potential for conflict with other policies and aspirations within the LP.

3.84 **Sport England:** Sport England would like to see the improvement of sports excellence at Tottenham Hotspurs training ground to be backed up by evidence. There is no mention of this is the 2018 PPS or the Blue and Green Strategy, and therefore Sport England have to question if this is the most appropriate location to invest in enhancements. What is the strategic assessment of this grounds and what sports will be accommodated for the community. This again raises questions on what evidence for sport and physical activity has informed the Local Plan and the requirement for a sports facility in location would be difficult to justify without it being strategically

identified as required to meet existing or future local sporting needs in an up-to-date PPS or BFS.

3.85 **Enfield Society:** The policy wording of PL9 is bold and ambitious but lacks detail and is not supported by evidence base work that could illustrates what, where and how the changes would be delivered. The policy could blur the distinction between rural and urban areas, contrary to NPPF Paragraph 180. The approach is inconsistent with national policy and the London Plan. Enfield Society members, who have contributed to the Enfield Chase Landscape Restoration project, are concerned that their work might justify the loss of important parts of Enfield Chase through compensatory improvements to areas of remaining Green Belt. The policy aims to improve public access to the rural area but is tied to unsound developments in the Green Belt. Biodiversity offsetting is not appropriate for the proposed developments at Chase Park and Crews Hill. The designated SINC at Crews Hill Golf Course is characterised by a large area of acid grassland habitat, which is rare and unique. The Vicarage Farm and Rifle Site SINC at Chase Park forms part of a strategic network protected by paragraph 185 of the NPPF. Biodiversity offsetting is not appropriate for established ecological networks. The proposed transformation of Enfield Chase, from a mixed agricultural landscape to woodland, meadows, and wetlands, conflicts with national policies for the historic environment and the London Plan policy HC1. The principles behind the policy are not evidenced and conflict with the landscape values identified in the Enfield Characterisation Study. Old Park, protected by Metropolitan Open Land designation, is critical to understanding a range of heritage assets in the area.

3.86 **Enfield Road Watch:** Enfield Road Watch contend that Policy PL9 should be deleted from the Local Plan. Of major concern is that the vision depends on S106 funding from developments elsewhere in Enfield's Green Belt, although this is not made clear in Policy PL9. They suggest the policy is misleading and contradictory, and there are elements that are not appropriate, for example connecting the Lee Valley Regional Park and Enfield Chase with one policy. They suggest that to imagine that Enfield Chase could become a multi-activity, high-volume destination with the car parking and other amenities that would be required is totally inappropriate in the context of the historic Enfield Chase landscape. The 'new cultural gateway' referred to paragraph 2b would inevitably be car-dependent, needing a large car park, and seems over-ambitious in its scope for the setting.

***SP PL10: Chase Park***

3.87 **Greater London Authority (GLA)**: The GLA has significant concerns about the ability of Crews Hill and Chase Park to deliver sustainable neighbourhoods that are not car-dependent. The GLA emphasises the need for a robust, masterplanned, and phased implementation strategy to ensure upfront provision of infrastructure and public transport services. Additionally, a realistic funding strategy is crucial to support this delivery and optimise land use.

3.88 **National Highways:** National Highways must ensure traffic impacts are mitigated, and a Transport Assessment (TA) is required for significant housing sites near M25 and SRN junctions. The plan emphasizes the importance of sustainable infrastructure and development in the right places, as walking times between new homes and amenities can exceed 30 minutes, reinforcing car dependency. National Highways are supportive that PL10 to PL11 promote active travel and integration into the transport realm.

3.89 **Transport for London (TFL):** Concerns raised regarding the lack of detail on transport proposals and recommends car parking be limited. Concerns regarding the lack of costed and agreed infrastructure, concerns work undertaken to date significantly underestimates the costs of providing new bus services. Further detail regarding trip generation and mode share required. Not convinced in regard to the

75% mode share target or limited parking, evidence required. TfL concludes there is 'no clear' way all housing and facilities will be 400 metres of the bus network as proposed. Concerns transport improvements/upgrades will still result in a low PTAL for urban development. Concerns regarding the likely 225 additional new vehicles, increasing traffic and congestion during peak times. Lack of confidence regarding costs of the Placemaking Area and lack of comprehensive coordination of the site.

3.90 **Historic England:** The proposed development, including Trent Park, will intensify green space use, necessitating contributions to a park management plan to plan and mitigate this increased use.

3.91 **NHS London Healthy Urban Development Unit:** The NHS HUDU urges the Council to make provision for changing needs and health priorities and demands over time in the placemaking area.

3.92 **Hertfordshire County Council (HCC):** HCC Ecology state Chase Park (Salmon Brook), requires drainage restrictions, greenfield discharge rates, and should avoid river and flood zone capacity reductions. HCC acknowledges the proposed SuDS scheme and brook restoration project, recommending early engagement with developers. HCC also raised concerns based on uncertainty surrounding the ecological and highways impacts on HCC. In regard to Chase Park HCC has raised concerns about increased vehicular trips into Hertfordshire due to the local plan growth, potentially resulting in unsuitable routes, such as Wagon Road, Dancers Hill Road, and Baker Street. HCC is open to discussing strategies to mitigate traffic on strategic routes. The Minerals Planning Authority has no concerns. Education and Early Years are reassured about provisions at proposed sites at Chase Park, but HCC expects Enfield to meet its own educational needs.

3.93 **Comer Homes Group:** Comer Homes supports Chase Park's allocation, particularly for family homes, and appreciates the proactive approach towards housing land supply in the Local Plan. Concerns were raised about designating Vicarage Farm as open space and proposed woodland, the road link to Hadley Road's impact on viability, and the proposal maps showing all of Comer Homes site within the Ancient Woodland designation. There were also concerns about potentially unnecessary 'expensive' infrastructure like bus routes, and the policy's ambiguity regarding employment and the need for clarity on flexible workspaces for small businesses. The policy's contradictory requirements on building heights in relation to the area's topography and public transport corridors were noted. Issues were raised about designating Vicarage Farm as open space given its status as a working farm, restrictive wording preventing appropriate development, and the impracticality of extending Trent Country Park. The site's access via a rural footpath was acknowledged, but the open space designation within the spatial framework was deemed impractical. While 20% BNG is ideal, Comer Homes stated it is too early to determine its feasibility. The proposed new 3FE primary school near the local centre is supported but should be reviewed due to declining birth rates. Concerns were raised about the provision of playing fields in public open space at 16b due to safeguarding issues, and the need for PL10 to reference that viability will shape development. The costs associated with the site are currently unknown and infrastructure including a bus route, affordable housing will impact viability. Comer Homes believes Chase Park is deliverable but reserves position on viability until infrastructure is costed. They recommend a more flexible approach to obtaining contributions and are motivated to resolve concerns collaboratively with the council.

3.94 **Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2:** The flexible approach towards housing delivery within and beyond the plan period is supported in principle, however concerns were raised regarding the placemaking diagram as it fails to set out how the links between the Ridgeway and the

main CPPA will be delivered. The consortium are supportive in principle of this approach but the Local Plan should provide more detail regarding the links. The representation recommends an additional 100 dwellings on the southern part of the allocation to the west of Arnold House based on exceptional circumstances existing and page 50 of the Local Plan. Land west of Arnold House "infill site" could be enhanced for ecological and community recreational purposes. Nicholas Holdings also expressed concerns Policy PL10 fails to meet sustainability requirements in the NPPF and have provided a concept layout which demonstrates how 100 additional dwellings can be delivered sustainability.

3.95 **Fairview New Homes:** Fairview supports the Local Plan and the allocation of Chase Park for development. They state there are no significant infrastructure or environmental barriers that could delay the project. Fairview, an experienced house builder, plans to deliver a mix of flatted and family homes, facilitating a quick response to local housing demands. The development is expected to help meet the Borough's housing needs and protect valued landscapes in the area. Fairview supports the council's proactive approach to meeting housing needs but requests more information on the housing target and further clarity. The comments support the Vision for Chase Park and the overall intent of Policy PL10 to create a sustainable new neighbourhood with a focus on green infrastructure. However, they suggest several clarifications to enhance the policy's clarity and effectiveness. They note that the current masterplanning framework should not be seen as a strict blueprint but rather as a guiding framework. They recommend rewording Figure 3.2 to emphasize its illustrative nature and inserting a paragraph to clarify this. They also recommend clarifications to figure 3.12, request more flexibility in terms of the site's capacity, and concerns around the prescriptive nature of the some of the requirements. They also suggest lowering the 20% net gain target to 10%, have concerns around the 50% viability requirement and suggest more flexibility is required, and also address concerns around the flexibility of the housing mix policy, and propose various other amendments and clarifications. Overall, the aim is to ensure that the policy is sound and effectively facilitates future planning applications while addressing the need for a comprehensive approach to development.

3.96 **London Diocese Fund:** Overall, the Fund is supportive of Chase Park Placemaking Area and the vision it sets out. They note that sites within the allocation can come forward independently of each other. The IDP should come forward as part of the Local Plan, and the Fund would have concerns if an SPD or IDP were delayed until after Local Plan adoption, leading to delays in delivering homes. They expressed general concerns that the production of an SPD will delay delivery. The framework plan identifies the client's site as Borough SINC, Flood Zone 2 and 3, public open space, and a Green Link however some of the site will provide supporting development.

3.97 **Capel Manor College:** The College land is small but provides an important linkage to The Ridgeway. Concerns regarding the placemaking area diagram as it may hinder the preparation of a detailed comprehensive plan for the placemaking area.

3.98 **Daisy Walker (200 Enfield Road):** Concerns regarding PL10 and SA10.1 boundaries, the scheme appears isolated and not making best use of Green Belt release land. Advises it does not optimise the potential of the site as the site capable of delivering more homes, and the inclusion of the subject site (200 Enfield Road) would allow better quality placemaking.

3.99 **CPRE London:** CPRE London opposes the development of Green Belt land at Chase Park (PL10), highlighting that it fulfils all Green Belt purposes and is inappropriate for development. They argue that Enfield has sufficient brownfield land and existing major sites like Meridian Water that should be developed first. CPRE emphasizes that Enfield

Chase is a beautiful and historic landscape, and development would significantly harm the area's character and identity. Additionally, the popular Merryhills Public Right of Way and countryside views from local footpaths would be ruined by urbanisation.

3.100 **Trent Park Residents Association:** The Trent Park Residents Association objects to the proposed developments at Vicarage Farm and the Trent Park Equestrian Centre on legal compliance grounds, arguing they are not 'sound' or in conformity with the London Plan and should be removed from the Local Plan. The objections include concerns that the developments would harm the historic setting of Enfield's Green Belt, disrupt key entrance points, strategic views, and the rural backdrop, damage the visual connection between Trent Park and the former Enfield Chase, urbanize popular pedestrian gateways, and encourage more car use due to poor public transport connectivity. Additionally, the developments would harm the tranquillity of areas like Williams Wood, negatively impact the Metropolitan Site of Importance for Nature Conservation, and result in the loss of the Trent Park Equestrian Centre, which holds historical and mental health value.

3.101 **Friends of Trent Country Park:** The Residents Group argues that the proposed developments at Vicarage Farm and Trent Park Equestrian Centre don't conform to the London Plan, disrupting the relationship between Trent Country Park and Vicarage Farm. They criticize the Trent Park Conservation Area Character Appraisal (CAA) for not considering the wider landscape setting and oppose further development due to potential harm to the area's character. Concerns are raised about the impact of the placemaking area on the Site of Importance for Nature Conservation (SINC), including school playing fields and the proposed heritage park and road leading to increased footfall. They critique Tyler Grange's report for not considering the SINC within Vicarage Farm's wider ecological network and argue that biodiversity net gain doesn't accurately measure the site's value in terms of strategic habitats linkages. The proposed extension of the Country Park and new open spaces wouldn't mitigate the impact on the Vicarage Farm SINC or compensate for the loss of the Merryhills Brook Valley's open countryside. They believe the approach doesn't conform to London Plan Policy G6B (1) as it would impact open space which is defined in the London Plan as undeveloped land even where it is inaccessible to the public, and that the proposals for Chase Park would result in the loss of the high-quality countryside experience.

3.102 **Enfield Road Watch:** Enfield Road Watch criticises the proposed development for being contrary to the London Plan's urban growth focus and causing harm to the valuable countryside without considering alternative locations. The development lacks community support and is opposed due to its severe impact on the area's character. The proposed 'urban' density is seen as inappropriate for a rural location and not in compliance with paragraph 130 of the framework, and the figure of 3,700 homes not justified. The Transport Strategy 2024 is deemed ineffective in delivering an LTN 1/20 and London Plan compliant transport network. The response questions the deliverability of the proposals, peak trips and delays and their impact on busses, the overall modal assumptions and shift, the transport modelling outputs and suggests these need scrutiny at examination. Furthermore, in the absence of a commitment from the NHS proposals for health facilities are not likely to be effective. It is unlikely that the entirety of new secondary school needs could be provided at local schools, leading to a substantial number of school trips towards a new secondary school at Crews Hill. The ecological appraisal commissioned by Enfield Road Watch from the chartered ecologist Dennis Vickers indicates that the use of Vicarage Farm and Rifles site SINC as open space would degrade the designated habitat.

3.103 **Enfield Society:** The Enfield Society opposes the proposed development at Vicarage Farm, citing its historical and landscape significance to Enfield Chase and Trent Park meaning it would not be in conformity with London Plan Policy HC1. They argue the

development's density, providing 3,700 homes, disrupts the area's character and therefore would not be in accordance with paragraph 130 of the framework. They also express concerns about the impact on the Archaeological Priority Area at Hog Hill and have commissioned a report from consultant Dr Philip Masters of Actaland Ltd to support their claim that the area is a valued landscape as defined by the framework. The creation of a new Green Belt boundary and an extension to Trent Country Park, blurs the distinction between Green Belt and non-Green Belt areas. They question the 'Whole Plan Viability Review' justifying 50% affordable homes highlight suggested discrepancies in the evidence base on family housing in the LHNA, topic paper and local plan and note the Council's evidence predicts fewer children and more older residents, suggesting a shift from family housing to 2-bedroom properties for downsizers. They note that the majority of new family housing in London is already delivered through apartments with communal spaces rather than houses. They suggest Gypsy and Traveller Accommodation needs could be met on Council-owned land without releasing Green Belt. They criticize the proposal to surround the Site of Importance for Nature Conservation (SINC) with development and the creation of a new Green Belt boundary. They note the development's completion after 2041 would delay the Country Park's use until the late 2040s or 2050s and could cause severe traffic congestion. They argue that the proposed bus and cycle routes are impracticable due to topographical constraints and distances to bus stops, making the target of 75% sustainable mode share unachievable.

3.104 **Enfield Archaeological Society:** Residents in the Society express concerns regarding legal compliance, specifically the clarity of the term "Heritage Asset" in Policies DE4 and DE10. While the incorporation of Historic England's 2019 recommendations is acknowledged, residents urge that the definition in the 'Acronym Buster and Glossary' explicitly include both built and buried heritage resources. For Chase Park (section PL10), residents are worried about the lack of consideration for the likely multi-period buried archaeological resources in the development area, particularly prehistoric archaeology evidenced in other parts of Enfield Chase. They recommend that the Masterplan include a comprehensive archaeological assessment based on fieldwork. Additionally, while welcoming the proposal to create a heritage park at the former Slades Hill army camp and AA gun site, they stress the necessity of full archaeological documentation and possible excavation prior to development for effective site interpretation.

3.105 **North West London RSPB:** The local branch of the Royal Society for the Protection of Birds opposes the proposed development of Vicarage Farm/Trent Park Equestrian Centre and other Green Belt areas in Enfield, arguing it would damage significant natural countryside and adjoining Sites of Importance for Nature Conservation (SINCs), not conforming to London Plan Policy G6. Vicarage Farm, a refuge for many bird species, is particularly important for seasonal migrants and hosts locally scarce Skylark and Swallow colonies, as well as breeding Hobby Falcons. The farm is a vital community resource, promoting health and wellbeing, and is ecologically significant due to its biodiversity. The group warns that the loss of undisturbed natural habitat would harm sensitive wildlife. An Ecology Habitat Survey of Glebe Fields, contiguous with Vicarage Farm, reveals the site's ecological importance. The development could isolate Boxer's Lake SINC and disrupt the Wildlife Corridor linking suburban Oakwood/Enfield with Vicarage Farm. The fields play a role in surface water management and provide a rural setting in the Protected Green Belt. The development could lead to the loss of public amenity, panoramic views, and the area's unique rural character. The group argues that Enfield Council has a legal responsibility to preserve and enhance biodiversity and that the region's overall ecology would be substantially diminished if the farm succumbs to development. They believe the whole farm would merit SINC status if the ornithological characteristics were fully recognized,

emphasizing that SINCs are afforded a high level of protection within the planning system although non-statutory.

3.106 **Bush Hill Park Residents Association:** The Residents Association state that section of Green Belt to be removed for Chase Park is currently designated as the Enfield Chase Area of Special Character within the current statutory Development Plan. Removal of this piece of Green Belt thus goes against the current Development Plan and should therefore be removed from the proposed ELP. The area proposed for development is part of a unique landscape in London: an historic Royal Chase. Though research it has been established as a special area which, despite modern encroachment, has largely survived. This important of this area was highlighted by Historic England in their Regulation-18 response. They raise concerns that there has not been adequate assessment of the potential effects on the significance of important designated heritage assets before the principle of the development specified at these locations is established". It is not clear that any new assessment has been carried out in the interim. Vicarage Farm forms a rural barrier between Enfield and Oakwood. The proposals would harm the identify of this barrier by creating an urban continuum between these areas with on-street development.

3.107 **Barnet Society:** The Society's object on principle to erosion of the Green Belt and would take particular exception to any loss of the green buffer that exists between the London boroughs of Enfield and Barnet, especially north and south of Hadley Road and Enfield Road. They state that these attractive stretches of countryside are vital to preserving the separate identities of Barnet, Hadley, Cockfosters, Enfield Town and other settlements that would otherwise have merged into amorphous suburbia.

3.108 **Residents/Businesses:** Many residents object to the placemaking area and Policy PL10, citing concerns about developing Green Belt land in Chase Park, Vicarage Farm, and Trent Park Equestrian Centre. They argue the plan will lead to urban sprawl, loss of countryside feel and special semi-rural character, and strain on already busy roads due to increased car journeys. They express concerns about the impact on wildlife, loss of historical landscape, increased car dependency, and non-compliance with London Plan policies. They argue that the proposed development will exacerbate traffic congestion, strain existing infrastructure, increase flood risks, overcrowd schools, and increase air pollution. They recognize the need for more housing in Enfield but argue there are sufficient non-Green Belt areas for development, citing the 2019 Enfield Society report "Space to Build" They oppose the construction of 5-storey blocks with shops, citing potential car dominance, negative impact on local jobs, and unsuitability of the proposed road layout and steep slopes in the area for walking, cycling, and disabled access. They express dissatisfaction with the overall development strategy for Enfield and argue that building on untouched Green Belt land will alter its character, disrupt wildlife habitats, and increase car dependency due to inadequate public transport and state that the added traffic will exacerbate congestion and pose risks to children traveling to nearby schools.

***PL11 Crews Hill***

3.109 **Greater London Authority (GLA):** The GLA has significant concerns about the ability of Crews Hill and Chase Park to deliver sustainable neighbourhoods that are not car-dependent. The GLA emphasises the need for a robust, masterplanned, and phased implementation strategy to ensure upfront provision of infrastructure and public transport services. Additionally, a realistic funding strategy is crucial to support this delivery and optimise land use. The GLA expresses concerns that the high cost of providing transport infrastructure and services for new, isolated settlements may not be realistic or viable. This could result in car-dependent areas with poor access to essential services and increased pressure on the road network.

3.110 **Transport for London (TFL):** TFL raised concerns regarding the lack of detail on transport proposals. Recommends car parking to be limited. Concerns regarding the lack of costed and agreed infrastructure, concerns work undertaken to date significantly underestimates the costs of providing new bus services. Further detail regarding trip generation and mode share required. Concerns transport improvements/upgrades will still result in a low PTAL for urban development. TfL concludes there is 'no clear' way all housing and facilities will be 400 metres of the bus network as proposed. Provision of a bus service at CH is not viable. Concerns there is no policy reference to 75% mode share target or limited parking. Concerns regarding the likely 550 additional new vehicles, increasing traffic and congestion during peak times. Lack of confidence regarding costs of the Placemaking Area and comprehensive coordination of the site.

3.111 **National Highways:** National Highways must ensure traffic impacts are mitigated, and a Transport Assessment (TA) is required for significant housing sites near M25 and SRN junctions. The plan emphasizes the importance of sustainable infrastructure and development in the right places, as walking times between new homes and amenities can exceed 30 minutes, reinforcing car dependency. National Highways are supportive that PL10 to PL11 promote active travel and integration into the transport realm.

3.112 **Hertfordshire County Council (HCC):** HCC Ecology stated that Crews Hill could reduce semi-natural habitats south of the M25, affecting the existing mixed land use of agriculture, development, and leisure. Although the development may degrade some ecological characteristics, it could enhance others and enhance their value. The extent of BNG for HCC benefits depends on landowner availability and potential impacts on local population pressure, industrial and leisure activities, and wider countryside resources. Currently unknown outcomes/impacts. HCC has raised concerns about the increase in vehicular trips into Hertfordshire due to the growth at Chase Park and Crews Hill. HCC is open to discussions on this matter. Concerns that Crews Hill development may need to mitigate traffic volumes along Cattlegate Road and onto settlements like Potters Bar, Cuffley, and Goffs Oak. Crews Hill placemaking area, could potentially impact Hertfordshire due to its proximity. The Minerals Planning Authority has no concerns. The borough council should be aware of the nearby Waste Management Site, Cattlegate Farm, which is safeguarded under Policy 5 of the Waste Core Strategy and Development Management Policies document. Education and Early Years are reassured about provisions at proposed sites at Crews Hill, but HCC expects Enfield to meet its own needs.

3.113 **Welwyn Hatfield Borough Council (WHBC):** WHBC raised concerns regarding the level of harm to the Green Belt and narrowing the gap between the settlement at Cuffley and London. The response highlights it is essential for Enfield to continuously update their Infrastructure Delivery Plan to address infrastructure implications as they emerge. Essential for Enfield to engage with neighbouring LPAs and Highways. Concerns regarding proximity of Crews Hill to WHBC, particularly highway and transport impacts.

3.114 **NHS London Healthy Urban Development Unit:** HUDU urges that the Council makes provision for changing needs and health priorities and demands over time.

3.115 **Berkeley Homes (North East London) Ltd:** Berkeley supports the policies overall identification of Crews Hill, in regard to SA11.2 aspects of the policy need modification for soundness, potential to provide compensatory BNG and relocate the Golf Course outside the allocation within the retained GB. This could be approached by using an SPD framework masterplan or equivalent and as such should be referenced in the policy. Furthermore, the capacity of SA11.2 should be increased to 350 homes. Supportive of Crews Hill and policy, to support growth in line with national and Enfield's

ambitions. Need for a detailed comprehensive, coordinated masterplan process via an SPD or subsequent planning mechanism for the placemaking area without being too onerous. Supportive of a parcel-based approach underpinned by an overarching masterplan to allow unconstrained parcels to be delivered. Berkeley keen to deliver homes and work collaboratively with the Council.

3.116 **LBE Strategic Property:** LBE Property states the Local Plan should not limit development to a maximum of 5,500 homes at Chase Park as the detailed design is yet to commence, supporting infrastructure is not fully confirmed, and there are mixed landowners within the area. They highlight the role of LBE owned sites in delivery and request a flexible approach to detailed masterplanning and the need for relocation sites. They highlight a lack of information on phasing in the evidence base and state that phasing should be based on up-to-date surveys and mitigation measures for any unavoidable loss of habitat. They note the Council plans to address SINC designations through landscape-led design and mitigation measures, and although the SINC Report recommends upgrading the SINC to a Metropolitan SINC, they do not consider this to meet the Crews Hill Placemaking Area objectives. They state the area should be split into phased parcels in the masterplan, with Phase 1 sites such as Crews Hill Golf Course, Kings Oak Equestrian Centre, and Sunbeam Stud to be developed within the plan period. They make a number of representations as to the capacity of individual sites in their ownership, stating these are logical and sustainable locations for future development which can be phased early in the plan period, and that increases in capacity on key sites could improve the viability position. They urge the council to consider sites in the placemaking area not currently allocated for development but instead designated as white land. The note the Golf Course Needs Assessment report concludes that if Crews Hill Golf Club were to be lost for redevelopment, there are sufficient alternative golf courses in the area. They state that the viability Assessment needs updating following the Regulation 19 consultation, including development and infrastructure costs and note final viability position is yet to be confirmed, with additional details required for the Local Plan examination. They assert the SPD requirement should prioritise activities related to phasing development, infrastructure costs, and scheme viability, but note that the evidence base for Crews Hill is already sufficient to begin parcel level masterplanning work, subject to a review of allocated land uses and input from Enfield's Design Review Panel on design codes for the placemaking area.

3.117 **Leonard F Jollye (Brookmans Park):** The Landowner is supportive of Crews Hill to deliver a sustainable development which meets the housing needs of the borough including affordable housing. Concerns regarding the 20% BNG proposed within the Local Plan policy, as National guidance now states that plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain unless justified, including local need, opportunities, and impacts on viability. The council has not justified it's reasoning for the 20%.

3.118 **Taylor Wimpey:** Taylor Wimpey note the SPD should be adopted during the Local Plan process, concerns there is no certainty in regard to timescales. Concerns if the IDP and SPD are delayed post plan adoption it will delay housing delivery at Crews Hill.

3.119 **Rockwell London Ltd for Kings Oak:** Rockwell are supportive and advise many sites including Kings Oak could be delivered now, whilst acknowledging the complex ownership in the area and need for a wider masterplan. They also however express concerns about the Local Plan's approach to masterplanning, coordination, and impacts on viability. They question the viability of the £50k per dwelling s106 contributions and 50% affordable housing, considering it 'borderline viable/un-viable'. They suggest more accurate evidence is needed and negotiations to reduce

contributions and affordable housing. They advise LBE to engage with owners on viability testing and propose 40% affordable housing. They identify that the viability work undertaken identifies conservative assumptions in the market position, such as no separate allowance for site-wide infrastructure, a developer profit of 15% of market GDV, and a low profit of 17.5%, and note the potential for the position to worsen based on market dynamics. They express concerns about the requirement for an SPD prior to permission being granted, Local Plan adoption timescales, and SPD preparation delaying delivery, and object to the use of an SPD post local plan adoption due to concerns of lead-in times and delivery. Despite these objections, Rockwell aims to deliver homes within the first 5 years of the plan period, subject to an agreement with Enfield Estates. They and Landvest aim to deliver 1,000 homes within the plan period. They worry an SPD will deviate into matters that should be addressed within the DPD and increase financial burden on development, particularly the impact of off-site infrastructure. They suggest minor amendments to avoid potential conflict in regard to applications and policy requirements. They note the lack of detail within the policies presents a risk that each individual application may be refused due to under-delivery of family homes to meet the overall site figures They seek clarity on which existing rural uses will be 'reprovided' and assume that the reprovision will not apply to the Equestrian Centre.

3.120 **Thompsons of Crews Hill Ltd:** Thompsons of Crews Hill as landowner is not promoting their land for development. The Plan is not in accordance with para 145 of the NPPF, the plan is unsound because the Council has not properly explored housing growth in urban areas and on brownfield land. The Plan is not in accordance with Policy D3 of the London Plan in that the Council has not sought to maximise the capacity on urban / brownfield sites. This is clear because of inconsistencies in the evidence base. The Policy is not clearly written and unambiguous.

3.121 **The Glasgow Stud:** Glasgow Stud object to the level of engagement regarding the development of land in their ownership. The Plan is contrary to the NPPF in that it includes an illustrative spatial framework and the NPPF requires policies to be clearly written and unambiguous. Burnt Farm Ride will require extensive works to upgrade it to standard which will require the removal of hedgerows, ponds and other habitats. The illustrative masterplan shows large parts of their land as 'white' whereas they are previously developed and are suitable for development. An ecological survey has been commissioned by the landowner and submitted with the representation shows that most of the site has medium to low ecological value and is suitable for development. The Council has not fully explored the necessary equalisation to enable development to proceed.

3.122 **Brookbank Stables:** Confirmation that the landowners are working together with other landowners and that the site is suitable for development.

3.123 **Warmerden & Co (Crews Hill) Ltd:** Concern that the policy requirement of 20% BNG is not based on evidence and suggest the Whole Plan viability Study used a figure of 10%.

3.124 **Crews Hill Golf Club:** The Golf Club note that the area allocated for development is a SINC which has not been considered and would not be in conformity with the Enfield Biodiversity Action Plan. The number of homes proposed is a small proportion of the overall number but would impact on the golf club, its members, its staff and visitors to the site. The site should be listed as a local heritage asset. The cost of infrastructure improvements will be large. The proposal is not in conformity with the London Plan on Brownfield sites or the NPPF in relation to greenbelt. There is no rail capacity to serve the proposal.

3.125 **Enfield Road Watch:** Enfield Road Watch argues that the proposed development contradicts the London Plan's policies, which aim to concentrate growth in sustainable locations. The development could distract the Council from other regeneration priorities and would likely result in sprawl beyond the identified development areas. The development's uncertain deliverability could lead to high harm in peripheral areas not currently proposed for development. The proposed Local Centre may be too small to anchor such large development proposals and could cause high levels of out-commuting by car, as would the uncertain delivery of bus and cycle infrastructure. The delay in the Local Centre's delivery could entrench car-dependency, contrary to London Plan Policy T1. The facilities provided might be smaller than expected for such a large development. The development could pressure the Council to permit applications that do not deliver all the benefits of a masterplan if a high housing target is adopted. The 50% affordable housing requirement is not supported by the Whole Plan Viability update by HDH (2023). Enfield Road Watch believes there is insufficient land for 5,500 dwellings. The land assembly picture remains uncertain despite the Council's repeated Calls for Sites since 2015. The needs case for a secondary school could drive development significantly beyond the indicated areas. The policy potentially allows for development on the golf course's fairways and greens, enabling development over a larger area. The policies would not effectively protect and enhance ecologically sensitive habitats. There are inconsistencies within the Crews Hill policy and site allocations regarding the Glasgow Stud SINC. The proposals for new parks and open spaces are ineffective as it is unclear whether landowners would sacrifice land with significant development value once released from the Green Belt.

3.126 **CPRE London:** CPRE London opposes the development of Green Belt land at Crews Hill (PL11), emphasizing its importance to the Metropolitan Green Belt and arguing that Enfield has sufficient brownfield land and existing major sites like Meridian Water for housing development. They state that Crews Hill, known for its plant nurseries and horticulture goods, is unsuitable for development, and urbanisation would adversely impact Sites of Importance for Nature Conservation at Crews Hill Golf Course and Glasgow Stud. Additionally, the Chain Walk Public Right of Way, Burnt Farm Ride Public Bridleway, and views from the Ridgeway would be compromised. Increased traffic would harm rural lanes, and the site is unlikely to meet the London Plan's requirements for non-car travel due to its proximity to the M25 and challenging topography for cycling infrastructure.

3.127 **Enfield Society:** The Enfield Society opposes the large-scale removal of land from the Green Belt particularly at Kings Oak Plain. They argue that the railway line should remain the Green Belt boundary. A Landscape Appraisal by consultants ENPlan found that the proposed development, especially the taller buildings, would be visible above the golf course's wooded horizon. The Society argues against using brooks to delineate boundaries, as it could lead to intrusive development. They question the effectiveness of a landscape-led approach given the Council's dual role as landowner/promoter and local planning authority. The Society suggests that the entire area west of the railway line should be protected as an Enfield Chase Area of Special Character. The Society calls for the inclusion of Whitewebbs and Forty Hall ASC, Clay Hill ASC, and Turkey Brook Valley ASC in the Local Plan. They propose that the whole of Enfield Chase should be designated as an Area of Special Character. The Society have also commissioned a Heritage Impact Assessment by Archaeology South East assesses the impact of the development on heritage assets. The Society contends that the development proposals for Crews Hill as shown in the placemaking area diagram will harm ecological networks and the Glasgow Stud SINC, including a what they consider to be an irreplaceable acid grassland habitat at Crews Hill Golf Course as set out in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024.They also highlight the area's limitations in terms of sustainable transport, with most trips likely to be made by car due to the infrequent bus service and challenging

topography for cycling. They question the viability of the proposed Local Centre and the likelihood of achieving the London Plan target of 80% of all trips by sustainable means. Finally, the Society opposes seeking £5.483 million of 'compensatory' funding from Green Belt developments to pay for the refurbishment of Rectory Farm, due to the significant harm to the borough's character and historic landscapes.

3.128 **Barnet Society:** The Barnet Society see merit in concentrating new development in a compact new, genuinely sustainable settlement around Crews Hill Station. We also support retention of the area's horticultural and food-producing industries, and exploitation of the education, training and employment opportunities they offer. But we have strong reservations about the continuing commercial viability of Crews Hill's present businesses faced with soaring land values and traffic congestion and would like to see a commitment in the Plan to their protection. Significant rail, road and other transport improvements must accompany any development. Enfield's proposed Strategic Policies T1, T2 & T3 set out good principles for these, but there is a striking lack of detailed proposals for Crews Hill and its neighbourhood.

3.129 **Bush Hill Park Residents Association:** The Residents' Association assert that the historic Enfield Chase extends into the areas proposed under this Policy. Significant harm will be caused to the remaining parts of Enfield Chase by these proposals. The proposals will harm the views from the Ridgeway across the historic landscape. The proposals for SA11.2 (currently a golf course) will remove the views of the historic landscape from the public right-of-way which runs from Cattlegate Road to Strayfield Road (Footpath #3). The scale of proposed development is very significant, and journeys are likely to be car-dominated over what are today narrow country roads. Whilst a bus service currently runs into Crews Hill, a long running and unresolved land dispute means it does not connect with the railway station. The proposals will mean the closure of dozens of small and medium businesses with the consequent loss of hundreds of jobs.

3.130 **Residents/Businesses:** Large numbers of residents objected to the placemaking area, due to concerns about developing Green Belt land and the loss of the popular garden centres and supporting businesses and related jobs, loss of green spaces, negative impact on views from the Ridgeway and rights of way along it, harm to designated Sites of Importance for Nature Conservation at Crews Hill Golf Course and Glasgow Stud, and urbanization of the Chain Walk Public Right of Way and Burnt Farm Ride Public Bridleway. Residents highlights the integral role of nurseries in Enfield's Green Belt, attracting business from inside and outside the borough. The development threatens the Green Belt at Kings Oak Plain and recent tree planting in the area, the rural setting of Whitewebbs Transport Museum, and will increase traffic, altering the character of rural lanes and putting pressure on the Conservation Areas at Clay Hill and Forty Hall. Residents suggest the proposals are likely to be car-dominated with few local jobs and challenging cycling conditions due to steep slopes deterring cycling. Residents object to Policy PL11 due to the potential danger posed to leisure cyclists by increased car traffic on narrow lanes like Whitewebbs Road, Cattlegate Road, and East Lodge Lane. They argue that the historic landscape and natural environment of Enfield, enhanced by years of tree planting, should be preserved. Concerns also include increased pollution from traffic and unnecessary housing development in the Green Belt, which contributes significantly to the community's quality of life. Residents acknowledge the need for affordable housing but argue against using Enfield's Green Belt for this purpose. They suggest that there are ample brownfield sites within the borough, especially in areas like Lea Valley and Epping Forest borders, which could be developed instead. These sites would have a much lower environmental impact compared to the Green Belt, aligning better with sustainable development goals while preserving the borough's natural landscapes and historical sites and consider that policy PL11: Crews Hill should be deleted from the

plan. They recommend deleting the policy to maintain the area's environmental and historical integrity. Residents express concerns that the proposed developments will significantly increase traffic in the area due to inadequate public transport services. They worry that nature conservation efforts at Crews Hill Golf Course will be compromised. The loss of long-standing garden centres, which have been a part of Enfield for many years, will be deeply felt if the development proceeds. Additionally, residents fear the proposed plans will obstruct historic vistas from the Ridgeway across the landscape of Enfield Chase. Residents oppose Policy PL11 due to concerns that building on this land will negatively impact the setting of Conservation Areas at Hadley Wood and Monken Hadley. They argue that the development would harm the historical and natural character of these areas, leading to a loss of green space and increasing urbanization, which could degrade the unique charm and environmental quality of these conservation sites.

### Chapter 4: Climate Resilience

3.131 **Environment Agency:** The draft Local Plan relies on an outdated SFRA, which does not reflect the latest flood risk data and climate change allowances. It needs to update the SFRA and apply the sequential and exceptions tests to all proposed allocations, deleting any sites that fail the tests or cannot be made safe. It also needs to incorporate the SFRA recommendations into the Local Plan policies and supporting text. The EA also stated that they are concerned that the Enfield Regulation 19 submission has not included a water resource and efficiency policy. The EA believe that including stand-alone policies with the latest data and advice would be beneficial to Enfield and the commitment to sustainability and ties this directly with London Plan Policy SL 5. The EA also expressed support for the protection and improvement of watercourses. However, we recommend that the supporting text includes some explanation of the importance of protecting watercourses for water quality, habitat availability, and connectivity in ecological features.

3.132 **Thames Water:** Expressed a range of views regarding flood risk and surface water management issues in Enfield and suggested that the plan should restate as a policy requirement the water efficiency standards already set out in Building Regulations Part G and required as a planning condition. The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

3.133 **LB Waltham Forest:** London borough of Waltham Forest (LBWF) generally support the policies in the Climate Resilience chapter. However, Policy SE4 should consider lowering the threshold for non-residential development, similar to Waltham Forest's policies, to maximise benefits.

3.134 **Home Builders Federation:** The Home Builders Federation (HBF) argues that the policy approach to the energy efficiency of buildings contained in Policy SE2 is unsound because it conflicts with national policy. Part 2 of the policy specifies that major developments should achieve a Home Quality Mark of 4.5, which diverges from current building regulations. The Government opposes local authorities setting their own energy efficiency standards, as stated by the then Housing Minister on December 13, 2023. The Government's stance is that multiple local standards increase costs and complexity for building new homes. The draft policy does not comply with the Government's requirement for additional standards to be a percentage uplift of the Target Emissions Rate (TER) using a specified Standard Assessment Procedure (SAP). The HBF also notes that, given viability challenges, particularly in the east of the Borough, the Council is unjustified in departing from the building regulations in this respect.

3.135 **NHS Property Services:** NHS Property Services (NHSPS) fully supports Draft Policy SE1's promotion of carbon-neutral development, aligning with the NHS's goal of achieving net zero carbon in all new projects. They suggest that NHS properties could benefit from carbon offset funds collected when on-site carbon mitigation cannot be met, aiding the NHS in becoming the world's first net zero healthcare provider. NHSPS considers the current wording of Draft Policy SE1 to be sound.

3.136 **Enfield Climate Action Forum (EnCaf):** The Climate Action Forum supports the policy direction of Chapter 4 but questioned Enfield's decentralised energy network due to the lack of an Energy Masterplan. The call for the policy to be strengthened and further evidence work to be prepared and for the policy to be amended to be in conformity with London Plan Policy SI 3 Energy Infrastructure which suggests boroughs should develop energy masterplans for large scale development proposals.

3.137 **Better Homes Enfield:** The campaign group welcome the inclusion of Policy SE3 and the requirement for all major proposals to include a whole life carbon assessment. However, they **r**aised specific concerns around the approach to whole-lifecycle carbon assessments recommended in the plan, and around the delivery of low carbon energy supply in the borough through Energetik, the council's wholly owned heat network provider.

3.138 **Other respondents:** Other respondents including landowners and developers such as Vistry Group, Blackrock, McCarthy and Stone, British Land, Segro and Prologis criticised the climate resilience and sustainability measures in the plan including the proposed 20% net gain requirement and sustainable design and construction standards as being not justified or deliverable and requiring more flexibility in their wording, particularly in relation to the small scale developments.

### Chapter 5: Addressing Equality and Improving Health and Wellbeing

3.139 **NHS Healthy Urban Development Unit (HUDU):** The NHS London Healthy Urban Development Unit supports the policy's aim to protect community buildings and encourages the use of the NHS HUDU model. It supports SC1's aim to contribute towards active and healthy lifestyles and recommends adding a requirement for development proposals to plan for and optimize these lifestyles, including measures to reduce health inequalities. They also welcome the requirement for Health Impact Assessments for large schemes and suggest it should be a validation requirement to ensure health considerations are integrated from the early design stages.

3.140 **NHS Property Services:** NHS Property Services (NHSPS) welcomes and supports Draft Policy SC1, which commits to promoting healthier lifestyles and improving overall health and wellbeing through new developments. They endorse the requirement for Health Impact Assessments on larger residential developments, major strategic developments in areas with poor air quality, and significant education, health, leisure, and community facilities. NHSPS considers the current wording of Draft Policy SC1 to be sound. NHS Property Services (NHSPS) supports the provision of quality community facilities but finds Draft Policy SC2 to be overly restrictive and not positively prepared. NHSPS highlights the potential negative impact on the NHS's ability to deliver essential services if healthcare facilities are rigidly classified as community assets.

3.141 **Sport England:** Sport England notes that additional homes increase demand for sports and recreation facilities and questions why the policy does not seek contributions towards improving existing or new facilities. While outdoor play space contributions are mentioned under exceptional circumstances, there is a need for specific references to open space, sport, and recreation provisions to address the

increased demand from new developments. Sport England make a number of detailed recommendations for changes to the policies.

3.142 **Metropolitan Police Service:** The Metropolitan Police Service Design Out Crime Team's response to this policy aims to ensure the timely provision of new or enhanced community facilities to meet the evolving needs of the borough's growing population. These facilities should preferably be located in defined town centres or accessible areas like public transport corridors. Community provisions under this policy include education and training, health and leisure facilities, children's play spaces, places of worship, burial spaces, libraries, pubs, cultural uses, and facilities related to community safety and security, such as police and emergency services.

3.143 **Transport for London (TFL):** TfL welcomes proposals for public realm improvements along main routes (A10, A406, A101) and at key stations and town centre gateways, as well as new crossings/bridges over the A10, A406, and Lee Valley line to address east-west severance. Early engagement with relevant infrastructure providers, including TfL, is essential. Additionally, confirming support for the Healthy Streets Approach would ensure consistency with other sections of the Local Plan.

3.144 **Places for London (The TFL Property Company):** Places for London broadly support Policy SC2. However, we strongly suggest that Sections 4 and 5 are amended to state that developer contributions 'may be sought' rather than 'will besought', since these requirements will depend on the specific considerations set out within each policy relating to both healthcare and education.

3.145 **McCarthy and Stone:** McCarthy and Stone address Policy SC1, which requires the submission of a Health Impact Assessment (HIA) for residential developments over 50 units. They argue that older persons' housing should not be perceived as a burden on healthcare infrastructure. Instead, the policy should acknowledge the significant health benefits such housing brings to individuals. They highlight that older persons' housing promotes better physical and mental health, reduces demands on health and social services, and allows for more efficient public resource use. McCarthy and Stone reference a report by WPI Strategy for Homes for Later Living, which details fiscal and well-being benefits, including annual NHS and social care savings of approximately £3,500 per resident and improved happiness and life satisfaction for older individuals. They emphasize that purpose-built housing for older people provides safe, warm, and adaptable living environments, contrasting with older homes that often present various health risks.

### Chapter 6: Blue and Green Enfield

3.146 **Natural England:** Natural England welcomes and supports the inclusion of blue and green infrastructure policies in the Local Plan. In particular Natural England welcomes Policy BG2, which outlines the protection hierarchy for designated sites and ensures development does not adversely affect SPAs and SACs unless it meets regulatory requirements. They appreciate the requirement for a Habitats Regulations Appropriate Assessment for developments likely to impact SPAs, SACs, or Ramsar sites. Additionally, they support the recognition that new developments could impact the Lee Valley SPA and Ramsar site, as well as Wormley Hoddesdonpark Woods (SAC), due to air pollution and increased recreational pressure, and endorse the Local Plan’s commitment to resisting developments that would significantly harm these sites. Natural England supports Enfield’s commitment to achieving a minimum of 20% biodiversity net gain for new developments across the borough and welcomes Policy BG3's inclusion of the Epping Forest Strategic Solution, requiring measures to mitigate adverse impacts on the SAC from residential developments within 6.2km. They acknowledge Enfield Council's contributions to the Strategic Access Management and Monitoring Governance Agreement and the agreed Recreational Mitigation Strategy.

They also appreciate that these measures must be delivered before occupation and in perpetuity, with Natural England's agreement. Regarding air pollution and habitat protection Natural England stated “The draft Local Plan needs to secure a strategic mitigation package for air pollution impacts on designated sites, especially Epping Forest SAC, before it is adopted. It also needs to complete an air quality assessment for the HRA and clarify the policy on biodiversity net gain.”

3.147 **Environment Agency:** The EA stated that the draft Local Plan relies on an outdated SFRA, which does not reflect the latest flood risk data and climate change allowances. It needs to update the SFRA and apply the sequential and exceptions tests to all proposed allocations, deleting any sites that fail the tests or cannot be made safe. It also needs to incorporate the SFRA recommendations into the Local Plan policies and supporting text. The EA also expressed support for water pollution stipulations and recommendation for additional guidance and footnotes. They were also supportive and pleased to see a biodiversity net gain requirement of 20% but strongly recommend that the need for applicants to consider the watercourse module of the statutory biodiversity metric for all application boundaries within 10m from the top of the banks of watercourses, within 5m of ditches, and for culverts that run through a sites red-line boundary. Support for the set-back requirement for development near to watercourses and gave a recommendation to strengthen this to a minimum of 8m.

3.148 **Epping Forest District Council:** EFDC appreciates the inclusion of Strategic Policy BG3 for protecting the Epping Forest Special Area of Conservation (EFSAC). However, the policy lacks specific text on air quality, referring instead to Strategic Policy ENV1, which does not specifically address the EFSAC and focuses on major developments. EFDC suggests referring to the Inspector’s Report for the Epping Forest Local Plan 2011–2033, which highlights the need for clarity and avoiding duplication in policies addressing air quality and the EFSAC.

3.149 **London Borough of Redbridge:** The London Borough of Redbridge recommends that the ELP's supporting text clarify that the 6.2km radius for the Epping Forest SAC 'Zone of Influence' is subject to review based on future Epping Forest Visitor Surveys. Additionally, they suggest that the appropriate Habitats Regulation Assessment (HRA) mitigation contributions for SAMMs and SANGs should also be subject to review and updated accordingly.

3.150 **Hertfordshire County Council (HCC):** HCC Ecology supports the recognition of the Site of Metropolitan Importance along the River Lea corridor, emphasising its importance as a continuous river corridor habitat extending into Broxbourne. Other than the above considerations, HCC does not see a reason to raise any fundamental concerns regarding the impact of the proposed ELP Reg 19 as presented, in respect of impacts within Hertfordshire. It is hoped, however, that appropriate GI will also be proposed as part of any major developments to help offset any potential increases in disturbance locally which may result.

3.151 **NHS Healthy Urban Development Unit (HUDU):** The NHS London Healthy Urban Development Unit welcomes the aspiration for Enfield to become London’s greenest borough and supports the enhancement of the Blue and Green Infrastructure network, particularly improvements to walking and cycling links and the promotion of food growing. The NHS London Healthy Urban Development Unit supports the policy's aim to promote food growing but notes the absence of minimum targets for developers, which raises concerns about the policy's deliverability.

3.152 **Lee Valley Regional Park Authority:** The Park Authority queried the strategic focus of Policy BG7 for enhancing beneficial uses and its relevance to the Lee Valley Regional Park area.

3.153 **Sport England:** Sport England supports policy BG8: Protecting Open Space but emphasises that temporary facilities should be avoided on playing field land to align with national and Sport England policies. They recommend that the requirement in 1.b. to restore open space to its original purpose should also ensure restoration to its existing quality. Additionally, part 1.d. should specify that any replacement open space must be of equivalent quantity and quality and serve the same function, such as replacing a lost playing field with another playing field, not just any open space. This would ensure compliance with Sport England policy and NPPF paragraph 103.

3.154 **London Wildlife Trust:** London Wildlife Trust recommended adding to Strategic Policy BG4: Biodiversity Net Gain, Landscape Restoration, and Offsetting under part 1 that all development proposals should follow the mitigation hierarchy (avoid, reduce [or minimise], mitigate, and compensate).

3.155 **Canal and Rivers Trust:** The trust was overall supportive of the council's vision for an integrated multifunctional green and blue infrastructure network and urged the council to support additional residential moorings on its network. It also noted that the River Lee Navigation was not always clearly referenced. Other respondents also commented on the suitability of residential moorings in some areas. The Trust is willing to engage further with the Council and encourages developers to have pre-application discussions.

3.156 **Swifts Local Network: Swifts & Planning Group:** We support policy BG4 in principle, but it is not sound because there is insufficient detail to be effective, and it is not consistent with national policy, because it does not consider London Plan policy G6 B4 and NPPG 2019 Natural Environment paragraph 023 which highlight the importance of swift bricks. Swift bricks are overlooked by the DEFRA BNG metric so need a separate clear policy.

3.157 **CPRE London:** supports the Plan's commitment to resist the loss of designated open space but suggests it should go further given increasing housing density. They recommend addressing green space needs per person to ensure sufficient amenity space, especially in high-density areas. They propose creating new green spaces in areas of deficiency, converting superfluous roads into 'streetparks,' and allocating railway sidings for nature recovery. They also advocate for policies to protect front and back garden vegetation, all mature trees, and private or semi-private amenity spaces, suggesting stronger protections like Town/Village Green status or Local Green Space designation. An example provided is the Falcon Fields Allotment, which should be designated to preserve its natural heritage and community value.

3.158 **Tottenham Hotspur Football Club:** The Club queried the detailed focus of enhancing the beneficial uses in Policy BG7 and also questioned the requirement for 20% Biodiversity Net Gain.

3.159 **Home Builders Federation:** The Home Builders Federation (HBF) argues that Part 2 of the policy, which requires a 20% improvement in biodiversity net gain (BNG), is unsound, unjustified, and contrary to national policy that advises a minimum of 10%. They highlight that the viability assessment was based on a 10% BNG assumption, and increasing this requirement to 20% would challenge many residential schemes, particularly in medium and low-value areas. These areas, including the strategic allocations associated with Meridian Water, have historically faced development challenges. HBF contends that it is unsound for the Council to exceed the national BNG policy, given these viability issues. They also queried the specific wording around the Zone of Influence and developments outside of it in relation to the recreational mitigation strategy for Epping Forest SAC.

3.160 **Developers, landowners and agents:** Numerous developers considered the requirement for a 20% Biodiversity Net Gain (BNG) is inconsistent with national requirements and not effective, justified or deliverable on viability grounds. Some such as Vistry also queried the need for Blue and Green Infrastructure Plans as part of planning applications and the ambition for schemes to exceed the London Urban Greening Factor Metric.

3.161 **The Enfield Conservative Group:** Eliminate vague wording and qualifying statements in policies BG8, BG10, DE10, and DE15 that give planning officers excessive discretion.

3.162 **Edmonton and Winchmore Hill Conservative Group:** The Edmonton and Winchmore Hill Conservative Association objects to the local plan proposal to build a crematorium at Church Street Recreation Ground.

3.163 **Enfield Climate Action Forum:** EnCaf Land Use Working Group (ELUWG) highlighted the community campaign to re-open Banbury Reservoir and create an adjacent public open space from a designated waste site. They also set forward the view that Policy BG7 for enhancing the beneficial uses within the Green Belt was not in conformity with the London Plan nor in line with National Policies. EnCaf Land Use Working Group (ELUWG) also support the regeneration of Meridian Water; however, in our opinion the quantum and quality of open space and recreational space proposed for PL5, which is within the 'Enfield Epping Forest SAC Recreation Mitigation Strategy 2023' is far too low and likely to negatively impact the Epping Forest Special Area of Conservation. They also largely support the aims of ELP BG11(3), however, our review of the ELP site allocations suggests that very little provision has been planned for food growing spaces and allotments in practice, and none in urban areas identified in the Blue and Green Strategy Audit as areas of deficiency.

### Chapter 7: Design and Character

3.164 **Historic England:** Historic England highlight that a key soundness issue with the draft Local Plan is the approach to tall buildings in Policy DE6. They appreciate the clarity on locations and heights of tall buildings, but object to the clause suggesting an acceptable level of harm to heritage assets, which contradicts the NPPF and the Town and Country Planning Act 1990. The policy's current wording implies that development could harm heritage assets, including conservation areas, without clear and convincing justification. Historic England recommends removing references to likely harm and ensuring that proposals for tall buildings consider impacts on heritage assets and comply with the overall Plan requirements. They are willing to address these issues through a Statement of Common Ground or participate in hearings if necessary.

3.165 **Greater London Authority:** The GLA state that the draft ELP identifies 58 locations for tall buildings, meeting LP2021 requirements. However, the GLA suggests considering broader areas rather than specific sites to facilitate understanding of potential harm. Policy DE6 should specify that tall buildings should only be developed in suitable locations. GLA suggests removing exceptions in Parts 5 and 6 of the policy to avoid perception of inconsistency in application across the Development Plan. The draft ELP provides various definitions of tall buildings across different parts of the borough, leading to inconsistency. GLA recommends clarity regarding where the measurement begins and consistency in defining tall buildings, whether measured from AOD or ground level. Seven small areas in the borough have different tall building definitions without explanation. GLA suggests providing rationale to underpin this approach and identify potential harm if development exceeds stated heights. The site allocations set maximum building heights, by using terminology such as '…tall buildings of no more that Xm in height…'This is not considered to be consistent with Policy D9 of the LP2021, which states that any such locations and appropriate building

heights should be identified on maps in Development Plans. This implies some flexibility which could include a range of ‘appropriate building heights’. This is considered to be practical in terms of enabling boroughs to focus the tallest buildings in a particular part of a tall building zone and potentially lower building heights as the context and townscape indicates.

3.166 **London Borough of Waltham Forest:** London borough of Waltham Forest (LBWF) support the approach to tall buildings and appreciate the alignment with London Plan Policy and additional design guidance for tall buildings. London borough of Waltham Forest (LBWF) also support the approach to protecting and managing the historic built environment.

3.167 **NHS Healthy Urban Development Unit:** The NHS London Healthy Urban Development Unit welcomes the policy supporting inclusive design in line with London Plan policy D5, as well as the requirement for submitting an Inclusive Design Statement. The NHS London Healthy Urban Development Unit emphasizes that tall buildings must be safely designed to protect residents and users from fire and other emergencies and to minimize the risk of suicide. They advocate for extra scrutiny at the planning stage to ensure safety considerations from design inception, including the materials and construction systems used.

3.168 **The Metropolitan Police:** The Metropolitan Police Service Design Out Crime Team emphasises that all developments should create safe and secure places by adhering to Secured by Design principles. Applicants must consult with Metropolitan Police crime officers early in the planning process and detail security measures and compliance within the Design and Access Statement (DAS). The Council will involve the Metropolitan Police in all major development planning applications. In high-crime areas, Secured by Design certification may be required for planning consent. If conflicts arise between Secured by Design principles and other urban design goals, applicants must justify the compromises in their DAS.

3.169 **London Wildlife Trust:** Whilst we welcome the overall strategic approach to tall buildings in the borough, we remain concerned that no reference is made to the particular impacts that tall buildings can have on biodiversity such as birds (daytime and nocturnal strikes), bats and nocturnal insects, in terms of their shading, lighting, wind tunnelling, facade treatments and location. The Lee Valley is a noted migration flyway for birds during early spring and autumn.

3.170 **The Enfield Conservative Group:** The Enfield Conservative Group argues that the Draft Plan's policy on tall buildings significantly deviates from the 2014 Development Management Document, which prohibited such buildings in sensitive areas. This policy shift is justified by an excessively high housing target, leading to the potential proliferation of tower blocks in low-rise residential areas. The Draft Plan lacks clear height thresholds for tall buildings and proposes significant height increases in several traditionally low-rise areas, which would adversely affect their character and violate London Plan requirements. The group highlights the negative social impacts of tall buildings, particularly in areas like Edmonton Green, and criticises the Character of Growth Study as fundamentally flawed. They emphasise that tall buildings in Enfield Town and other historically and architecturally sensitive areas are inappropriate and unsound. The Councillor for Southgate Ward emphasized that Southgate is primarily composed of low-rise residential homes and businesses, including conservation areas. Introducing high-rise buildings would drastically alter the character of the area, contrasting sharply with the existing built environment. Councillor Emma Supple highlighted Enfield Town's historical significance, mentioning its ancient vicarage, church, and market square, which form an important heritage site. She argued that

plans to build tall, tower buildings in this area are inappropriate and unacceptable, as they would harm the conservation area.

3.171 **Home Builders Federation:** The Home Builders Federation (HBF) argues the policy is unsound as it implies that pre-application advice is compulsory for securing a decision. Applicants have the right to submit a planning application without seeking pre-application advice. The HBF also argues that Part 1e of DM DE13: Housing standards and design is unsound as it contradicts national policy. The policy requires applicants to build according to the BRE Home Quality Mark, an environmental performance standard not endorsed by the Government. On December 13, the Government clarified that local authorities should not mandate alternative environmental standards, especially those related to energy efficiency. Therefore, the reference to the BRE Home Quality Mark should be deleted.

3.172 **Developers, landowners and agents:** A number of developers provided detailed comments on various aspects of the policies in this chapter. Some such as the Royal London Mutual Insurance Society Limited for Southbury Leisure Park and Places for London (Transport for London) supported the general alignment of Policy DE6 with The London Plan, but also highlighted potential inaccuracies in height definitions and the need for flexibility in site allocations. Many developers made representations to have their sites included in the areas defined as appropriate for tall buildings including Telereal Securitised Properties GP, SEGRO, Meridian Water, Joseph Homes, SEGRO and Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). Some landowners advocated a different definition of tall buildings. A number of developers also expressed concerns about the proposed requirement for pre-application discussions including Vistry, Blackrock and others, and the need to contribute planning contributions for Conservation Area Appraisal and Management Plans from developments with 50+ residential units and the viability challenges associated with this. There were other concerns raised around the impact of some of the requirements on viability, including around landscape and public realm, accessibility and amenity including daylight and sunlight and dual aspect homes as well as the proposed requirements for commercial development sites.

3.173 **Residents/businesses:** Numerous individual residents also responded regarding Policy DE6: Tall Buildings in reference to specific areas, stating that the policy was not sound or legally compliant due to the impacts on heritage and character. These included:

- Area 1: Cockfosters – Concerns around the impact of tall buildings on the Trent Park Conservation Area, Enfield Chase Area of Special Character, and the potential impacts of tall buildings on traffic and parking in the area.
- Area 2: Enfield Town - Concerns around the impact of tall buildings on heritage assets in the area, including the conservation area, St Andrew's Church and the Market Square, on the retail offer of the town centre, and on traffic and parking.
- Area 6: Southgate - Concerns around the impact of tall buildings on the listed Southgate Underground Station, and that these would be out of character with the predominantly low-rise suburban housing in the area. Concerns around traffic and parking and air quality impacts of development.
- Area 8: Palmers Green - Concerns around the impact of tall buildings on the Lakes Estate Conservation Area, Broomfield Park, and character of Palmers Green. Residents suggest brownfield land should be prioritised for development.

## Chapter 8: Homes for All

3.174 **Greater London Authority:** The target for 2019-2029 to deliver 12,460 new homes is noted and welcomed. The target beyond 2029 is based on various factors, including the 2017 SHLAA figures, small sites target, transport infrastructure, and local evidence of capacity. However, concerns arise regarding the inclusion of proposed developments like Chase Park and Crews Hill, requiring Green Belt release and exceptional circumstances. While the LP2021 sets a small sites target, the Housing Topic Paper indicates a shortfall in delivery compared to the target. The GLA questions the relevance of the Government's standard methodology for calculating housing need in the London context, considering the adoption of the London Plan in March 2021. The GLA supports Part 6 of Policy H2 in the draft ELP, as it aligns with LP2021 Policy H5 Supported and Specialist Housing. The GLA emphasises that the affordable housing thresholds set out in the LP2021 are not minimum requirements but rather levels above which viability assessments are not required. While the clarity regarding the number of required Gypsy and Traveller pitches is appreciated, the absence of specific sites capable of accommodating these pitches is noted. Therefore, it's emphasised that Enfield Borough Council (LBE) must ensure provision for these pitches alongside addressing other housing needs outlined in the plan.

3.175 **London Borough of Waltham Forest:** London borough of Waltham Forest (LBWF) looks forward to the cooperation with them to identify the appropriate need and facilitate necessary provision for Traveller Accommodation. London borough of Waltham Forest (LBWF) support proposals for purpose-built student accommodation that meet strategic needs and ensure occupancy by specific educational institutions, including affordable options. With the University of Portsmouth establishing a facility in Waltham Forest and our strategic approach to developing student accommodation, collaboration between our councils on these proposals is crucial. London borough of Waltham Forest (LBWF) note that Enfield's guideline mix of 50% social/affordable rented housing and 50% intermediate housing contrasts with Waltham Forest's 70% low-cost affordable rent and 30% intermediate housing products.

3.176 **Hertsmere Borough Council:** Support for planning to meet the identified need for 21 pitches but questioning why this requires a separate local plan. Suggestion for small-scale private sites (5-6 pitches) to ensure better management and coexistence with settled communities.

3.177 **NHS Healthy Urban Development Unit (HUDU):** The NHS London Healthy Urban Development Unit generally supports Policy H5 and its goal to address the specialist needs of vulnerable people in Enfield. However, they suggest an amendment to criterion 8 to better reflect situations where specialist housing is best provided as part of a larger development. The NHS London Healthy Urban Development Unit (HUDU) supports the policy to provide student accommodation where there is an identified need in appropriate locations. However, they emphasize the need to consider the impact on local health infrastructure due to the influx of students, primarily aged 18-22. This demographic shift could affect the use of local services, increase reliance on urgent care, and significantly raise demands on mental, acute, and sexual health services. Additionally, the preference for digital services among students may necessitate further investments in local digital health services. The NHS London Healthy Urban Development Unit welcomes the policy's commitment to providing minimum levels of larger and family units to prevent cramped and poor-quality accommodation. They suggest allowing flexibility to adapt to changing demand and market conditions during the plan period. They also recommend ensuring all standards, not just space standards, are adhered to by suggesting revised policy wording.

3.178 **Home Builders Federation:** Broadly support approach to housing target but seek clarification on 5% difference between housing requirement and housing supply and justification for it. This point was also raised by the London Diocesan Fund. The Home Builders Federation (HBF) acknowledges finds the Council's planning for completions on small sites—379 dwellings per annum (dpa) for 2019/20 to 2021/22 and 281 dpa for subsequent years—reasonable and consistent with historic trends and windfall assumptions.

3.179 **Vistry Group:** Vistry Group supports the principle of 50% affordable housing on publicly owned land and 35% for other major developments, aligning with the London Plan (2021), and the 50/50 tenure split between intermediate and social rented housing. They aim to maximize affordable housing delivery through partnerships, sometimes achieving 100% affordable housing schemes. However, Vistry suggests draft policy H2 should consider site-specific circumstances impacting affordable housing delivery and explicitly state that the Viability Tested Route is available to justify lower affordable housing levels when necessary, reflecting market conditions and financial challenges.

3.180 **McCarthy and Stone:** McCarthy and Stone, a retirement housing developer, express concerns regarding Policy H5, which focuses on facilitating appropriate housing for elderly and vulnerable people in Enfield. They note that while the policy promotes independent living for the elderly, it is unclear what this entails and may be interpreted as adaptable conventional housing rather than specialist housing with care. They highlight that the identified need for specialist housing for older people (both C2 and C3 use classes) in Enfield is significant, as outlined in the Enfield Local Housing Needs Assessment and other documents. McCarthy and Stone argue that the policy should more explicitly support specialist housing to meet the needs of older people, in line with the latest NPPF, which emphasizes the need to cater to different groups, including the elderly. They also object to the requirement for older persons' housing to provide affordable housing as stipulated in Policy H2 and suggest corresponding amendments to Policy H5 to align it with national policy and positively address the housing needs of older people.

3.181 **Other landowners, developers and agents:** A number of developers such as Landvest Crews Hill Limited, Places for London, NHS Property Services and Warmerden & Co (Crews Hill) Limited raised concerns about the viability impacts of affordable housing and housing mix requirements in the plan, particularly for key strategic sites. Some such as Rockwell property and the Diocese of London Raised concerns around the phasing and trajectory of specific sites and the lack of information published in this regard at Regulation 19 stage.

3.182 **Enfield Climate Action Forum:** Expressed concerns around the accuracy of the Council's HELAA process, and the accuracy of its small sites/windfall assessment and targets. Suggested a range of additional development management considerations in relation to small sites and requested a community-led call for sites process to support this. Suggested inconsistencies in housing figures within the evidence base, and highlighted ways in which the plan could go further to support family sized homes.

3.183 **Better Homes for Enfield:** Queried the evidence in the housing topic paper and how this has been set out, including the conformity of the Local Plan with Paragraph 4.1.11 of the London Plan and the need for a realistic windfall allowance based on past rates of small site delivery and suggested alternative time periods for this assessment. Highlighted potential inconsistencies in housing figures and HELAA as a result of the new revisions policy on net additional dwellings statistics, and highlighted the potential impact of Census data on housing need. Highlighted the potential to consider concealed households in the assessment of housing need and in relation to housing

mix policies. Raised concerns regarding the viability assessment and affordable housing requirements and queries around the detailed approach to viability assessment. Better Homes Enfield questions the ELP's approach to affordable housing, particularly its emphasis on larger family-sized homes. They suggest reconsidering viability assessments with a lower proportion of family-sized homes to enhance affordable housing delivery. They recommend adjusting the policy framework to ensure a higher delivery of affordable housing.

3.184 **The Enfield Conservative Group:** The Enfield Conservative Group suggested to clarify Policy Wording to focus on Brownfield Sites: Apply H4, section 2 only to brownfield sites to align with London Plan policy H1.

3.185 **Other respondents:** A very large number of template responses were received from residents. These stated “I consider the Plan not legally compliant and not sound, because it is (tick all that apply): Not positively prepared and justified because the housing target post-2029 is based on sites put forward for development, not whether they are actually needed, and without infrastructure improvements. That is unacceptable for Green Belt release., Not justified as the alternative/brownfield sites have not been prioritised and developed to their full capacity. Also, policy H4 should limit intensification within 800m of a station to brownfield sites, per London Plan policy H1., Not justified as the exceptional circumstances, especially for site RUR.02, have not been evidenced., Not consistent with national policies as allocation of site RUR.02 fails to take into account its designations, isolated location and it not being a sustainable development location., Not consistent with national policies and legislation as the extensive Reg.18 representations were not taken into account., Not consistent with national policy as it fails to adequately consider the Neighbourhood Plan policies and proposals.”

*Please note, the proposed site allocations in the plan are listed in Policy H1 but responses in relation to these sites have not been considered here. A summary based on each placemaking area is provided above, and a full summary of representations from respondents relating to each individual site allocation is provided in Appendix B3. The full schedule of representations from individuals is available online from the council’s webpage.*

### Chapter 9: Economy

3.186 **Greater London Authority (GLA):** provided feedback on employment policies, recommending a clearer breakdown of the 304,000 sqm industrial and logistics space need into specific use classes, particularly B2 (General Industrial) and B8 (Storage and Distribution), for improved planning clarity. They suggest that Table 9.1 should specify whether potential sites for industrial floorspace intensification are Strategic Industrial Locations (SILs) or Locally Significant Industrial Locations (LSISs) and indicate the use classes they could accommodate. The GLA also advises adopting a plan, monitor, and manage approach for industrial intensification, prioritising brownfield sites and phasing in more challenging sites later in the Plan period. Additionally, they call for a coordinated plan-led approach to reconfiguring SILs at Meridian Water and stress that developments within or adjacent to SILs must not compromise industrial activities, with intensified industrial uses completed before residential components are occupied. Finally, they recommend breaking down performance indicators for net changes in SIL and LSIS floorspace into SIL and LSIS components and providing further details for Class B8 and B2 capacity.

3.187 **ARGO Real Estate Limited:** supports the Draft Local Plan’s focus on economic growth and industrial intensification, particularly within Strategic Industrial Locations (SILs). However, they critique Chapter 9 for not adequately supporting emerging high-tech industries, such as data centres. They recommend modifying the plan to include flexible, adaptable policies that recognise and promote these sectors, aligning with

national and regional guidelines. ARGO advocates for policies that not only support traditional industrial and logistics uses but also address the evolving needs of high-tech industries to fully leverage socio-economic benefits.

3.188 **Danescroft (FRELD Claverings) LLP**: supports the principle of redeveloping the Claverings Industrial Estate for industrial and logistics use. However, they raise concerns about the Council's design principles, highlighting issues such as boundary inconsistencies, level differences, and unrealistic intensification targets. They propose measuring industrial intensification by volumetric capacity and operational yard space rather than just floorspace and recommend modifications to the draft site allocation masterplan. Additionally, Danescroft advocates for including a broader range of acceptable uses in Locally Significant Industrial Sites (LSIS) as per London Plan Policy E4(A), emphasising the need for flexibility in industrial intensification policies.

3.189 **Vistry Group:** provides feedback on the employment policies with a focus on several key areas. They comment on the requirements and amount of employment floorspace needed for key sites, stressing the importance of site-specific considerations. They support the introduction of an affordable workspace policy aimed at meeting the needs of smaller businesses by offering spaces at least 10% below standard market rates. However, Vistry Group finds the policy's current guidelines too general and burdensome for developers, recommending clearer guidance and expectations to ensure effective delivery of affordable workspaces.

3.190 **Prologis:** supports the draft policies related to Strategic Industrial Locations (SILs) and employment growth, particularly endorsing the focus on protecting SILs, intensifying sites, and incorporating multistorey logistics spaces. However, they note a discrepancy between Policy E1, which allocates 31,500 sqm to Ravenside Retail Park, and Site Allocation SA 5.7, which specifies different figures. Prologis suggests amending the policy to a "minimum of 32,500 sqm" to better align with the Local Plan and facilitate the development of a multi-level logistics hub.

3.191 **SEGRO's** comments on Policy E2: Promoting Jobs and Inclusive Business: they believe Policy E2 should incorporate flexibility, acknowledging that maximising employment floorspace through site intensification might not always be practical. They find the policy’s expectations for small and medium enterprises (SMEs) and co-working spaces unclear and argue that it may not always be feasible to deliver the variety of workspaces and unit sizes required, depending on site-specific constraints. They suggest that Policy E3 should be revised for greater flexibility. They are concerned that the policy’s rigid approach, especially regarding site-specific factors and market needs, could hinder nuanced decision-making. They advocate for a planning balance that considers various factors and allows for more adaptable policies. They criticise Policy E5 for being too rigid and lacking consideration for site-specific factors and the needs of employment occupiers. They argue that this inflexibility could obstruct business expansion and new employment opportunities. They also raise concerns about the policy’s support for business relocation, suggesting it may introduce practical challenges and delays. They raise concerns about Policy DM E8: Providing for Workspaces requiring developments over 1,000 sqm to provide 10% affordable workspace, noting discrepancies between the policy’s text and its application. They suggest incorporating an option for payment in lieu to accommodate different scales and operational models and highlight the lack of a viability assessment in the Plan’s Evidence Base. They find the requirements in points 2 and a, b, and c of Policy DM E9: Local Jobs, Skills, and Local Procurement too burdensome and potentially counterproductive to investment. They suggest that the policy should be more reflective of the diverse employment sector and proportional to encourage redevelopment. They also seek clarity on the financial contribution calculation formula outlined in Appendix D.

3.192 **The LBE Strategic Property team:** supports the new ELP, especially the allocation of Land East of Junction 24 for a logistics hub. They recommend revising the plot ratio from the London Plan and suggest considering a single-storey design for practicality. They propose a flexible approach to employment floorspace, recommending an approximate figure of 48,000 sqm rather than a strict minimum. LBE SPS also emphasises the need for collaboration with Hertsmere Council and acknowledges that the Enfield portion of the site could proceed independently if necessary. They suggest the site is deemed deliverable per NPPF criteria: it is available (owned by LBE), suitable (currently Green Belt but allocated for employment development), and achievable (market-attractive with no major constraints). Initial feasibility studies support its development, either as an independent LBE project or part of a larger scheme including land in Hertsmere. LBE Strategic Property stresses the importance of ongoing cooperation with neighboring Local Planning Authorities (LPAs), as required by the Localism Act 2011 and NPPF guidelines. They support the Council's Duty to Cooperate Compliance Statement (2024) and highlight the need for discussions with Broxbourne and Hertsmere to ensure a well-prepared and justified strategy for the Local Plan, particularly for the CHPA and Junction 24 sites.

3.193 **Areli Developments Ltd. (ADL):** supports the inclusion of site URB.28 (Land and Buildings South East of Stockingswater Lane) in Policy SP E1: Employment and Growth, which estimates an additional capacity of 80,753 sqm. They advocate for the capacity to be seen as a minimum rather than a maximum, suggesting that the policy be updated to reflect this flexibility. ADL's recommendations aim to allow for potential higher capacities if appropriate design solutions are identified, thus supporting the plan's goal of intensifying industrial land to boost employment.

3.194 **Meridian Water team:** supports the ELP's goal of delivering 304,000 sqm of industrial and logistics floorspace by 2041. They endorse the 'brownfield first' approach and the strategy of utilizing urban sites for growth as set out in Policy SP E1: Employment and Growth**.** They support the safeguarding principle set out in Policy SP E3: Strategic Industrial Locations and the planned reconfiguration at Meridian Hinterlands sites. They believe the proposed range of land uses, including general and light industrial, storage and distribution, and research and development, aligns with London Plan Policies and supports diverse industrial and logistics needs. Meridian Water supports the industrial-led regeneration framework outlined in Policy E13 for the Meridian Hinterlands area. They appreciate the focus on delivering new workspaces before residential development and emphasize the need for future masterplanning to ensure effective industrial/logistics operations within a mixed-use setting. They recommend reflecting this masterplanning in site allocations policy and determining indicative capacity through future planning to optimize brownfield site use in line with London Plan Policy D3.

3.195 **Blackrock UK Property Fund:** critiques the Draft Local Plan's approach to employment and design policies by advocating for greater flexibility. They argue that mandatory pre-application advice for all planning applications is excessive and could burden both the Planning Authority and developers, thereby increasing costs and prolonging approval times without substantial benefits. In terms of employment growth, Blackrock emphasises that relying solely on multi-storey industrial configurations for intensifying employment land is insufficient to meet the diverse needs of Enfield's businesses. They recommend a more adaptable approach that includes a variety of development forms to address the broad spectrum of occupier requirements. Additionally, they caution against rigid reliance on vertical developments and highlight the practical difficulties associated with integrating affordable workspaces into new schemes, suggesting that such policies should be balanced with pragmatic considerations.

3.196 **CCLA Investment Management (CCLA):** representing the Landowner for site 5 Pickett's Lock Lane, suggests several revisions to enhance the Draft Local Plan's employment policies. They advocate for policy E1 to focus on improving productivity and operational efficiency rather than just expanding floor space, emphasizing modern industrial needs. For policy E2, they recommend a pragmatic approach to intensification and modernization of existing sites, rather than a one-size-fits-all solution. In policy E5, CCLA proposes incorporating elements like higher building heights and improved infrastructure to align with modern business requirements. They also recommend revising policy E7 to allow flexibility in site redevelopment, supporting modernization over strict floor space requirements. For policy E8, they suggest focusing on providing suitable workspaces without mandating specific sizes for small or medium units. Lastly, CCLA critiques policy E9 for being overly restrictive and proposes removing penalties related to reducing floor space to avoid impeding development and maintaining competitive advantage.

3.197 **Goodman UK Limited:** raises several concerns and recommendations regarding the Draft Local Plan. They advocate for modifications to Chapters 7 and 9 to support a diverse range of modern and high-quality employment premises. Goodman regrets the removal of the proposed extension to the Great Cambridge Road SIL, arguing it would have addressed the need for additional employment land and improved site efficiency. They stress the importance of robust boundaries and the Agent of Change principle to protect industrial operations from residential encroachment. While supporting the direction of Draft Policy E3 on Strategic Industrial Locations, Goodman suggests aligning it more closely with the London Plan by broadening the range of supported industrial uses. They also back the goal of industrial intensification in Draft Policy E5 but criticize the emphasis on business retention and relocation, arguing that such matters should be addressed commercially rather than through planning policies.

3.198 **Henry Boot Developments (HBD):** expresses several concerns and recommendations regarding the Draft Local Plan. They advocate for a flexible and transparent approach to site intensification, particularly for the Montagu Industrial Estate, arguing that the proposed 38,600 sqm of employment floorspace is not justified given current permissions. HBD opposes the draft plan's emphasis on Green Belt releases for industrial needs, believing this should be a last resort and that the focus should be on urban intensification. They highlight a potential conflict between the draft Plan's mitigation requirements and the London Plan's 'Agent of Change' principle, which protects the operational integrity of Strategic Industrial Locations (SILs) and Locally Significant Industrial Locations (LSILs). HBD supports the protection of employment land and the restriction of inappropriate uses in SILs but calls for greater alignment with existing permissions and infrastructure needs.

### Chapter 10: Town Centres and High Streets

3.199 **National Highways Limited:** supports the promotion of commercial and business development within existing areas and the re-occupation of vacant floorspace to mitigate traffic congestion on the M25 from local trips. They advocate for locating retail activities in sustainable areas with good transport links and stress the importance of considering the cumulative impacts of town centre activities, which generate trips. They highlight that primary shopping areas, often including high-trip attractions like medical centres and childcare venues, can significantly impact traffic, particularly during peak hours. National Highways underscores the need for transport assessments to address severe impacts on the strategic road network and to identify necessary transport improvements to manage these effects.

3.200 **Transport for London (TfL):** recommends modifying Part 2 of SP TC1 to emphasise that all development should enhance placemaking in town centres by creating an

attractive and accessible public realm that is safe for all users at all times. They also support SP TC2's goal of achieving zero road deaths by the specified year, welcoming this commitment.

3.201 **The Enfield Society:** supports preserving distinctive features and historic character in town centres but is concerned that prioritising growth and investment might lead to the development of tall buildings that could negatively impact Conservation Areas and harm the historic environment, conflicting with national and London Plan policies. Regarding Enfield Town, they argue that its current status as a Major Town Centre under the existing Core Strategy has been effective without the need for tall buildings, suggesting that such significant changes are unnecessary for maintaining its role.

3.202 **The London Borough of Waltham Forest:** broadly supports the approach in the Town Centres chapter, particularly valuing its emphasis on growth and investment to ensure long-term vitality. They appreciate the focus on urban greening, links to green and blue networks, and the sequential approach to development. They also endorse the management of use-classes, markets, meanwhile uses, and co-working locations, as well as the strategies for development outside designated centres.

3.203 **Asda Stores Ltd**: supports the Placemaking Vision for Southgate and the inclusion of Asda's store within the District Centre boundary. They recommend clarifying Figure 3.7 to reduce ambiguity and emphasise the need for sufficient vehicular parking for food shopping despite supporting improvements to the pedestrian environment and reduction of surface car parks. They also suggest amending Strategic Policy TC2 to include "where appropriate to do so" for certain criteria, acknowledging that minor developments may not meet all policy requirements. Asda looks forward to engaging with the Council on a future Supplementary Planning Document (SPD) to further support the placemaking vision.

### Chapter 11: Rural Enfield

3.204 **NHS Healthy Urban Development Unit (HUDU):** The NHS London Healthy Urban Development Unit supports the emphasis on landscape restoration, active travel initiatives, climate resilience initiatives, food growing areas and gardens, eco-tourism and leisure activities, and biodiversity offsetting.

3.205 **Sport England:** Sport England requests evidence to support the proposed improvements for sports excellence at Tottenham Hotspur's training ground in PL9: Rural Enfield.

3.206 **London Wildlife Trust:** London Wildlife Trust welcomes and support the policies in this chapter.

3.207 **The Forty Hill and Bulls Cross Study Group:** The study group highlights concerns to tree planting and undefined "earth moulding" as acceptable environmental improvements in the Green Belt. They argue that both could be detrimental to the Green Belt, particularly affecting its views and openness, and are not defined in the NPPF or London Plan.

### Chapter 12: Culture, Leisure and Recreation

3.208 **Sport England:** Sport England welcomes the strategy set out in policy CL4: Promoting Sporting Excellence but notes some elements do not comply with national policy or Sport England's Playing Field Policy. Concerns include: The council's Playing Pitch Strategy (PPS) from 2018 is outdated. Sport England encourages updating it or adding wording to paragraph 1 to ensure development and investment contribute to actions in the PPS and any other sports facility strategy. Sport England recommends that the

council produce an updated Playing Pitch Strategy (PPS) and a Built Facilities Strategy (BFS). These strategies should be developed in partnership with Sport England and National Governing Bodies for Sport (NGBs). The Local Plan should include specific policies for indoor and outdoor sport facilities, including playing fields, based on a robust evidence base. These policies should focus on protecting, enhancing, and potentially developing new facilities to meet current and future demands. Sport England also objected to the loss of a number of sport facilities in the area, highlighting their in the planning application process. Sport England requests evidence to support the proposed improvements for sports excellence at Tottenham Hotspur's training ground in PL9: Rural Enfield. They note that this is not mentioned in the 2018 PPS or the Blue and Green Strategy, questioning the appropriateness of the location for enhancements. They ask for a strategic assessment of the grounds and clarification on which sports will be accommodated for the community. This situation highlights the need for an up-to-date PPS or BFS to justify the requirement for a sports facility and ensure it meets existing or future local sporting needs.

3.209 **Lee Valley Regional Park Authority:** Supported the broad approach to Culture, Leisure and Recreation in the Plan and its legal compliance, but proposed minor amendments to the development management policies regarding leisure and tourism and visitor accommodation to ensure soundness.

3.210 **Tottenham Hotspur Football Club:** THFC generally supports the spatial approach of the Plan concerning land at Whitewebbs Lane, including the Club's Training Centre and surrounding land. However, several modifications are needed to correct inaccuracies, provide clarity, and make the Plan sound. THFC welcomes the opportunity to discuss these representations further with Enfield Council before the submission of the Local Plan or during its Examination to reach an agreement on the necessary modifications for accuracy and soundness. THFC supports Policy CL4's objectives of promoting sporting excellence across the Borough but suggests several changes to improve clarity and effectiveness. THFC proposes that the development management criteria in Policy CL4, intended to apply to all developments across the Borough, should not be applied to Allocation RUR.07.

3.211 **Enfield Climate Action Forum (EnCaf):** The EnCaf Land Use Working Group (ELUWG) supports the intentions of Policy CL5: Sport, Open Space, and Recreation in the ELP (Reg 19) but identifies several issues that render it non-compliant with relevant legislation and not sound. While acknowledging the health, social, and environmental benefits of open space, ELUWG highlights the lack of up-to-date evidence, particularly regarding the Playing Pitch Strategy, which limits the policy's effectiveness in addressing local deficiencies in sports facilities. They argue that the plan fails to provide adequate new open spaces in areas with existing deficits, such as Edmonton, where significant population growth is anticipated. ELUWG criticizes the plan's reliance on outdated assessments and the unclear responsibility for managing new green spaces, which raises concerns about the viability and delivery of CL5's objectives. Furthermore, they point out inconsistencies between the policy and the overarching goals of the London Plan 2021 and the National Planning Policy Framework (NPPF 2023), particularly in terms of promoting healthy, safe communities and addressing open space needs. ELUWG suggests that the monitoring metrics should be improved to better track gains and losses in open space, allotments, play spaces, and playing pitches to ensure the policy effectively addresses identified needs and deficiencies.

### Chapter 13: Movement and Connectivity

3.212 **National Highways:** National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport

Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. National Highways' response regarding policies T1 and T3 and the requirement for a Transport Assessment (TA) includes support for the TA to ensure sustainable infrastructure. However they stated that “the assessment is unclear as to the transport impacts of the Local Plan on the M25 at and around Junctions 24 and 25. In relation to Table 5-1 (repeated as Table 4-3 of the Infrastructure Development Plan) the descriptive impacts do not provide the full picture, including additional delays to off slips at both junctions and additional queues at M25 Junction 24 eastbound off slip with the additional Local Plan development that would likely queue back onto the main carriageway. We have been in dialogue with Enfield Council and their consultants about these potential impacts at M25 Junctions 24 and 25. Accordingly we have requested that Enfield Council look at these delays in more detail as there is some uncertainty around these queues and delays given the strategic nature of the assessment. We are awaiting further transport modelling evidence to discern whether the Local Plan is sound in relation to impacts at M25 Junctions 24 and 25. As mentioned above we are awaiting further details of the likely transport impacts at M25 Junctions 24 and 25. We will then be able to judge whether there is an unacceptable impact and a need to future proof the network in accordance with Paragraphs 51 and 52 of DfT Circular 01/2022. . A ‘monitor and manage’ strategy may be required moving forward but this will be discussed and reflected within a SoCG.

3.213 **Transport for London:** TFL express their support for the draft Local Plan's objectives of delivering sustainable growth and reducing car dependency but raising serious concerns about the soundness and viability of the placemaking areas at Crews Hill and Chase Park. They argue that these locations have poor public transport accessibility and would require significant investment in transport infrastructure, urban design, and parking management to achieve the desired outcomes. They also emphasise the need for a clear and robust masterplan and IDP to guide the development and delivery of these areas. They question whether these areas are consistent with the Good Growth principles of the London Plan and the transport objectives of the Mayor's Transport Strategy.

3.214 **Greater London Authority:** The GLA welcomes the draft local plan's aspiration to support sustainable growth by promoting walking, cycling, and public transport.

3.215 **Hertfordshire County Council (HCC) Highways:** HCC state the plan is wholly consistent with Hertfordshire’s policies and general approach from a sustainable travel perspective and therefore is supported. The principles around strategic sites in particular are welcomed, in terms of ensuring sites are highly accessible by sustainable travel. HCC do however have some specific concerns regarding some of the spatial allocations, as well as the wording around parking policies.

3.216 **Broxbourne Borough Council:** Overall, Broxbourne Borough Council highlights discrepancies in traffic modelling outputs and expresses concerns about the potential adverse impacts of the proposed developments in Enfield on the highways network in Broxbourne. They argue that these issues need to be addressed to ensure the soundness of the ELP.

3.217 **London Borough of Waltham Forest:** London borough of Waltham Forest (LBWF) considers adding "appropriate parking provision that seeks to minimise car parking" to ensure active travel and modal shift are prioritised.

3.218 **Network Rail:** Network Rail (NR) currently has no capacity concerns regarding proposed housing numbers but requires ongoing consultation. NR welcomes private investment for capacity and accessibility improvements at stations and in the network. They highlight the importance of integrated travel improvements and the potential for Crossrail 2 on the West Anglia Main Line, while discouraging permanent redevelopment within the safeguarded Crossrail 2 corridor.

### Chapter 14: Environmental Protection

3.219 **Natural England:** Natural England welcomes Policy ENV1's commitment to ensuring all major developments are at least air quality neutral, which will help reduce air quality impacts on designated European sites. However, they emphasize the need for further measures to ensure smaller developments do not harm these designated sites.

3.220 **Environment Agency:** Support for policy approach to protection of Source Protection Zones.

3.221 **London Wildlife Trust:** London Wildlife Trust supports policy ENV1 and recommends adding to paragraph 14.17 that lighting should avoid unnecessary energy use and adverse impacts on road safety and wildlife. Specifically, lighting can disrupt ecosystems of nocturnal species, especially near water and migration paths like the Lee Valley. It is essential to ensure lighting is focused only on intended areas to prevent spillover effects on surroundings.

3.222 **Metropolitan Police Service:** The Metropolitan Police Service Design Out Crime Team highlights the importance of lighting in enhancing community safety and supporting nighttime activities. However, the policy seeks to prevent light pollution, including glare and light spillage, to avoid negatively impacting residential amenities or the countryside's character. The goal is to balance the benefits of lighting for safety and evening activities with the need to protect the environment and quality of life.

### Chapter 15: Delivering and Monitoring

3.223 **Department for Education:** The Department for Education (DfE) states that under the Education Act 2011 and the Academies Act 2010, new state schools are now academies/free schools, with DfE as the delivery body rather than local authorities. Local authorities, however, retain the responsibility for ensuring sufficient education provision and securing contributions from development. DfE aims to collaborate closely with local education departments and planning authorities to meet the demand for new education infrastructure and has provided guidance on securing developer contributions and estimating pupil yields. The DfE supports the Council’s policy SC2 on safeguarding land for schools but finds the plan unsound regarding the level of developer contributions towards education. Enfield's Draft Local Plan proposes a contribution of £3,324 per dwelling, whereas DfE guidance suggests the cost should be £11,960 per dwelling based on current pupil yield data and school place costs. The DfE recommends Enfield clarify their methodology to accurately reflect pupil yields and costs, ensuring that the total cumulative cost of complying with policies does not undermine plan deliverability. Without these modifications, the DfE considers the plan not positively prepared and lacking a justified and effective approach to education provision.

3.224 **Transport for London:** TfL welcomes the requirement for developments to contribute towards improvements at Enfield Town station, although they cannot commit to increased peak hour frequencies. They also support the requirement for car-free development, consistent with the London Plan and considering the PTAL of up to 6a. TfL welcomes the statement about seeking contributions to increase station capacity and improve station access. They note that while gateline capacity could be increased

within the existing station, achieving step-free access may require a broader station reconfiguration and access to adjacent land. TfL reiterates that contributions towards public transport improvements should have equal priority with affordable housing to align with the London Plan. Such contributions are necessary for development in the Placemaking areas, as specified in the individual policies. This priority should be reflected in the Infrastructure Delivery Plan.

3.225 **Thames Water:** We consider it important that there should be a specific policy relating to Wastewater/Sewerage and Water Supply Infrastructure. We consider that the Local Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs).

3.226 **Sport England:** Sport England notes that additional homes increase demand for sports and recreation facilities and questions why the policy does not seek contributions towards improving existing or new facilities. While outdoor play space contributions are mentioned under exceptional circumstances, there is a need for specific references to open space, sport, and recreation provisions to address the increased demand from new developments.

3.227 **Home Builders Federation:** The Home Builders Federation (HBF) argues that aspects of the policy are unsound and contrary to national policy. They appreciate the Council's prioritisation of affordable housing but note concerns with other priorities. HBF asserts that biodiversity net gain (BNG) of 10% is already a legislative requirement and should not be included in S106 agreements. They oppose the plan's 20% BNG requirement, as only 10% was tested for viability. HBF also recommends removing climate change goals from the list, as these are covered by Building Regulations. Additionally, they argue that skills training is a strategic issue better addressed at a national or London-wide level and not suitable for local planning gain. They suggest concentrating development gains on affordable housing and key infrastructure.

3.228 **Vistry Group:** Vistry Group supports reducing financial contributions for job loss and apprentice requirements while acknowledging the importance of adjusting financial obligations for inflation. However, they seek clarity on various contributions not listed in Appendix E, such as flood mitigation, public transport, cooling measures, green infrastructure, heritage impacts, conservation appraisals, public art, and EV charging points. Understanding these contributions is essential for assessing site viability and informing proposals. Additionally, they request more details on contributions related to Epping Forest and conservation area appraisals.

3.229 **NHS Property Services:** NHS Property Services (NHSPS) supports Draft Policy D1, which requires that new developments meet relevant policies and infrastructure requirements in a timely manner, with an allowance for reduced S106 contributions if demonstrated to render the development unviable. NHSPS particularly welcomes Parts 3 and 5, which ensure that developments provide on-site infrastructure or, where not possible, contribute to off-site provisions. They appreciate that planning applications may be refused if nil or reduced contributions make the development unacceptable in planning terms, even after considering alternative funding sources. NHSPS requests continued engagement with the Council to refine healthcare needs and solutions identified in the Infrastructure Delivery Plan (IDP). They emphasize the need for flexibility in determining how to meet healthcare needs, including financial contributions, new on-site infrastructure, free land/infrastructure/property, or a

combination thereof. It is crucial that the NHS and its partners collaborate with the Council to formulate appropriate mitigation measures NHS Property Services (NHSPS) supports the draft policy requirements identified in the Whole Plan Viability Update but notes that the assessment does not specifically account for contributions towards healthcare. NHSPS recommends including a separate cost input for healthcare contributions in the viability assessment to ensure proper mitigation, inform developers of potential on-site or off-site financial requirements, and support effective implementation of Draft Policy D1. They express willingness to engage further with the Council to establish a reasonable cost assumption for future viability assessments.

3.230 **Canal and Rivers Trust:** The Trust generally aims to maintain its assets in a "steady state," with towpath maintenance based on current usage. When new developments are likely to increase usage, the Trust's maintenance liabilities will also rise. Therefore, it is reasonable to request financial contributions from developers either to cover the increased maintenance costs or to upgrade the towpath surface to a more durable standard that can handle increased usage without adding to the Trust's future maintenance burden. Additionally, there should be further clarity on the delivery of towpath improvements. While paragraphs 2.65-2.69 refer to walking and cycling, they do not mention the towpath or 'green loop.' This should be addressed for greater clarity.

3.231 **Places for London – The TFL Property Company:** Places for London request that Section 4 of Draft Policy SP DI in relation to review mechanisms make reference to and accord with Policy H5 of the London Plan, Threshold Approach to Applications.

3.232 **NHS HUDU:** The NHS London Healthy Urban Development Unit (HUDU) supports Policy D1's commitment to securing funds for infrastructure through CIL and s106 contributions. They suggest health infrastructure should be prioritized higher in the Infrastructure Priorities list in figure 15.1, despite its interlinkage with other priorities like air quality and active travel. HUDU recommends that all site allocations mitigate their development's impact on health infrastructure, prioritizing contributions to existing health site capacity. They also suggest that where site allocations include a health facility, the plan should reassess its necessity as it progresses, and s106 agreements should specify design requirements or include a fallback financial contribution if the space cannot meet NHS needs.

3.233 **Better Homes for Enfield**: Better Homes Enfield's response to housing KPIs in the draft ELP suggests several modifications to improve clarity and comprehensiveness. They recommend that KPIs for new homes (both net and gross) should include cumulative numbers for the entire plan period and separate reporting for small sites. Draft Policy H4 should be referenced in housing capacity metrics, and information sources should include brownfield registers and planning data. They propose separate reporting for different types of affordable housing (e.g., Social Rent, London Affordable Rent) and tracking affordable homes lost through demolition or Right to Buy. The response also suggests adjustments to KPIs for planning contributions, specialist housing schemes, Build to Rent, and student housing to include cumulative figures and detailed breakdowns. Additional KPIs are recommended for tracking HMOs, housing mix changes, permitted development conversions, Traveller accommodation, and contextual data such as the council house waiting list and vacant homes. These modifications aim to ensure the KPIs effectively monitor housing delivery and align with policy goals.

3.234 **Historic England:** It is clear that intensification of use of green space will follow from the proposed development, including that of Trent Park, which is both a conservation area and a registered park and garden. Contributions towards a management plan for the park should be required so that this increased use can be planned for and

mitigated. Suggested change: Include requirement that development proposals make contributions towards conservation area/registered park and garden management plan.

## Appendix C: Site Allocations

***Placemaking Areas***

***PL1 Enfield Town***

### SA1.1: Palace Gardens Shopping Centre

3.235 **Transport for London:** General Comment

3.236 **Historic England:** Proposed amendment to wording.

3.237 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.238 **Environment Agency:** Ground Source protection zone considerations. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.239 **NHS London Healthy Urban Development Unit:** Observations around the potential or a healthcare facility.

3.240 **Politicians/Local/National Interest Groups:** Objection from local councillors based on population statistics, objection from Better Homes based on the need for higher densities than proposed.

3.241 **Promoters/Developers:** Support for the allocation.

3.242 **Residents/Businesses:** Residents feel that more consultation is needed regarding the proposals for floorspace above commercial premises. They express that the current process involves an overwhelming amount of information, making it too complex for most people to effectively scrutinize and engage with the plans.

### SA1.2: Enfield Town Station and Former Enfield Arms

3.243 **Transport for London:** Proposed amendments to strengthen policy wording from should to must.

3.244 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.245 **Environment Agency:** Ground Source protection zone considerations. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.246 **Historic England:** Amendments suggested around the placement of taller buildings and the need to respond to the historic character of the area.

3.247 **NHS London Healthy Urban Development Unit:** Observations as above.

3.248 **Politicians/Local/National Interest Groups:** Objections. The Enfield Society raised a number of issues around tall buildings in this location.

### SA1.3: Tesco, Southbury Road

3.249 **Transport for London:** Proposed amendments to strengthen policy wording from should to must.

3.250 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.251 **Environment Agency:** Ground Source protection zone considerations. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.252 **NHS London Healthy Urban Development Unit:** Observations as above.

3.253 **Politicians/Local/National Interest Groups:** Better Homes suggests that incorporating the Royal Mail depot and Savoy Parade properties could significantly enhance housing capacity

### SA1.4: Enfield Civic Centre

3.254 **Transport for London:** As above

3.255 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.256 **Environment Agency:** Ground Source protection zone considerations. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.257 **NHS London Healthy Urban Development Unit:** Observations as above.

3.258 **Politicians/Local/National Interest Groups:** Better Homes suggests that integrating the disused police station site between SA1.4 and SA1.7 could significantly enhance housing capacity. Enfield Society raise concerns about tall buildings on the site.

3.259 **Residents/Businesses:** Residents express agreement with the consolidation of council departments to reduce costs but strongly disagree with the proposal to incorporate high-rise domestic dwellings. They oppose high-rise buildings and any reduction of green space in the borough, advocating for the use of brownfield sites instead of green belt land to meet development needs. Their concerns emphasize maintaining the character of the area and preserving existing green spaces.

### SA1.5: St Anne's Catholic High School for Girls

3.260 **Transport for London:** As above

3.261 **Sport England:** Sport England objects to the application as it appears to advocate the loss of the leisure centre without it being replaced. As result, this would not meet NPPF, paragraph 103.

3.262 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.263 **Environment Agency:** Ground Source protection zone considerations. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.264 **Politicians/Local/National Interest Groups:** Objection

### SA1.6: 100 Church Street

3.265 **Transport for London:** as above.

3.266 **Environment Agency:** The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.267 **Politicians/Local/National Interest Groups:** Concerns from the Enfield Society regarding the extant planning permission on the site.

### SA1.7: Oak House, 43 Baker Street

3.268 **Transport for London**: as above.

3.269 **Environment Agency:** The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

***PL2 Southbury***

### SA2.1: Colosseum Retail Park

3.270 **Transport for London:** Comment as above.

3.271 **NHS London Healthy Urban Development Unit:** Observations recommending ongoing negotiations with the Integrated Care Board (ICB) to ensure appropriate phasing and delivery of healthcare services.

3.272 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.273 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

3.274 **Landowner/Developer:** Blackrock UK Property Fund's response highlights concerns that this permission is unlikely to be implemented before it lapses in July 2024. They suggest that the site allocation should be amended to include industrial development (B2/B8 uses) to improve viability and align with demand for employment uses.

3.275 **Politicians/Local/National Interest Groups:** Better Homes note site is listed with a capacity of 1,587 homes, whereas the approved application allows for up to 1,800 homes, questioning why the lower figure is used.

### SA2.2: Heritage House

3.276 **Transport for London:** Comment as above.

3.277 **Landowner/Developer:** BL Logistics Investment Limited (British Land) supports the land use principles set out in draft site allocation Policy SA2.2 - Heritage House, and the identification of the site for industrial redevelopment under Use Classes E(g)iii, B2, and B8, subject to the necessary amendments detailed in their representations.

### SA2.3: Morrisons, Southbury Road

3.278 **Transport for London:** TfL supports in principle replacing the footbridge over Southbury Road with a pedestrian crossing. Other comments as above.

3.279 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.280 **Environment Agency:** Ground Source protection zone considerations.

3.281 **Politicians/Local/National Interest Groups:** Better Homes state the site was proposed for 892 homes, a feasibility study indicated that 1,050-1,250 units are achievable, but the ELP only estimates 646 units, which is significantly lower. They question the basis for this reduction, citing incomplete reports and a lack of clarity in the Council's Site Allocation Topic Paper. Consequently, the site has not been optimised.

### SA2.4: Southbury Leisure Centre

3.282 **Transport for London:** TfL welcomes the requirement for developments to contribute towards improvements at Southbury station. Other comments as above.

3.283 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.284 **Environment Agency:** Ground Source protection zone considerations.

3.285 **Landowner/Developer:** Support, but with comments

### SA2.5: Tesco, Ponders End

3.286 **Transport for London:** Comment as above

3.287 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.288 **Environment Agency:** Ground Source protection zone considerations.

### SA2.6: Sainsburys, Crown Road

3.289 **Transport for London:** Comment as above.

3.290 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.291 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

### SA2.7: Crown Road Lorry Park

3.292 **Transport for London:** Comment as above.

3.293 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.294 **Environment Agency:** Ground Source protection zone considerations.

### SA2.8: Land and buildings north of Lincoln Road

3.295 **Transport for London:** Comment as above.

## PL3 Edmonton Green

### SA3.1: Edmonton Green Shopping Centre

3.296 **Transport for London:** Comment as above.

3.297 **Environment Agency:** Objection due to flood risk. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.298 **Historic England:** Amendments proposed to recognise the Southgate Circus conservation area.

3.299 **Sport England:** Comments regarding the need for more sport facilities to be referenced in the policy.

3.300 **NHS London Healthy Urban Development Unit:** Support with comments.

### SA3.2: Chiswick Road Estate

3.301 **Transport for London:** TFL note the site is in a high PTAL area and should be car free.

3.302 **Environment Agency:** Objection due to flood risk. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

## PL4 Angel Edmonton

### SA4.1: Joyce Avenue and Snells Park Estate

3.303 **Transport for London:** The development should be car free.

3.304 **Sport England:** This allocation is delivering a significant number of homes which will increase demand on open space, sport and recreation provision in the area and this should be more clearly recognised in the policies.

3.305 **NHS London Healthy Urban Development Unit:** Proposed amendments to clarify the provision of new health centres in the area to respond to new development and population increases.

3.306 **Environment Agency:** The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

### SA4.2: Upton Road and Raynham Road

3.307 **Transport for London:** TfL welcomes the requirement for the development to contribute towards access, facilities, and interchange improvements at Silver Street station. Others comments as above.

3.308 **Environment Agency:** Objection as site is FZ2 and FZ3. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

### SA4.3: Langhedge Lane Industrial Estate

3.309 **Transport for London:** Comment as above.

3.310 **Environment Agency:** The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

### SA4.4: South-east corner of North Middlesex University Hospital Trust

3.311 **Transport for London:** Comment as above.

3.312 **Environment Agency:** The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.313 **Landowner/Developer:** Vistry Group supports the draft site allocation for the North Middlesex University Hospital site (SA4.4) but requests amendments for greater flexibility. They suggest increasing the housing capacity from 260 to 300 homes, updating the delivery timeframe, and ensuring the Planning Brief link is functional. They recommend reconciling contradictory design principles regarding the non-designated heritage asset and allowing for taller buildings up to 48m (16-storeys) instead of 39m (13-storeys).

### SA4.5: Public House, 50-56 Fore Street, London

3.314 **Transport for London:** Comment as above.

3.315 **Environment Agency:** The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.316 **Politicians/Local/National Interest Groups:** Better Homes Enfield asserts the site is listed with a capacity of 58 homes, despite having planning permission for 110 home

## PL5 Meridian Water

### SA5.1: Meridian Water Phase 1

3.317 **Transport for London:** Comment as above.

3.318 **Thames Water:** Comments regarding network capacity and ground source protection zones.

3.319 **Environment Agency:** Ground Source protection zone considerations and flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.320 **Sport England:** Sport England would like to see specific mention under ‘infrastructure requirements’ of playing fields and recreation facilities delivered on site or contributions made off-site. Decisions for on and off- site contributions should be based on an up-to-date PPS and BFS which will provide key evidence to support the strategic need for sport facilities.

3.321 **NHS London Healthy Urban Development Unit:** A healthcare delivery plan should be secured for the site, and any subsequent applications should include a similar agreement to provide a health facility.

3.322 **Landowner/Developer:** The Meridian Water team welcomes the inclusion of various Meridian Water sites, including those under Enfield Council ownership: Meridian Water Phase 1, Meridian Water Phase 2, Meridian 13, and Meridian East (Harbet Road). They are keen to maintain a positive and constructive dialogue with the Local Planning Authority (LPA) to refine the Site Allocations' requirements, ensuring the draft allocations are based on up-to-date evidence and thus justified. This includes addressing gaps and inconsistencies in the accompanying plans, which can be readily rectified. Vistry Group supports the draft site allocation for Meridian Water Phase 1 (SA 5.1) but requests amendments to reflect planning permissions and development potential. They propose including a row for non-residential floorspace in the table, updating Footnote 8 to reference extant planning permissions, and revising design principles to allow for buildings up to 100m in height. Additionally, they seek to align the draft site allocation with the Tall Building Maps in Appendix C, reflecting the approved heights and ongoing discussions with the Council.

3.323 **Politicians/Local/National Interest Groups:** Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

### SA5.2: Meridian Water Phase 2

3.324 **Transport for London:** Comment as above.

3.325 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.326 **Sport England:** Objection as a result of loss of equestrian land.

3.327 **NHS London Healthy Urban Development Unit:** Observations recommending ongoing discussions with the NHS regarding the funding and phasing of the health facility at each development phase.

3.328 **National Grid:** Support, but with comments.

3.329 **Landowner/Developer:** Supported as above, but with comments

3.330 **Politicians/Local/National Interest Groups:** Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

### SA5.3: Former IKEA store, Glover Drive

3.331 **Transport for London:** Comment as above.

3.332 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.333 **Landowner/Developer:** Support, but with comments

3.334 **Tottenham Hotspur Football Club:** Objection to the approach towards tall buildings, particularly the wording suggesting acceptable harm to heritage assets.

3.335 **Politicians/Local/National Interest Groups:** Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

### SA5.4: Tesco Extra, Glover Drive

3.336 **Transport for London:** Comment as above.

3.337 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.338 **Politicians/Local/National Interest Groups:** Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

### SA5.5: Meridian 13 (also known as Teardrop)

3.339 **Transport for London:** Comment as above.

3.340 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.341 **Landowner/Developer:** Support, but with comments

3.342 **Politicians/Local/National Interest Groups:** Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

### SA5.6: Meridian East (also known as Harbet Road)

3.343 **Transport for London:** Comment as above.

3.344 **Environment Agency:** Objection due to flood risk. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.345 **National Grid:** Support, but with comments

3.346 **Landowner/Developer:** Meridian Water (LBE) state that for Meridian East (Harbet Road), it should be acknowledged that capacity figures are minimum estimates to be refined through future masterplanning to optimize the brownfield capacity of these sites via a design-led approach in accordance with London Plan Policy D3.

3.347 **Politicians/Local/National Interest Groups:** Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

### SA5.7: Ravenside Retail Park

3.348 **Transport for London:** Comment as above.

3.349 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.350 **Landowner/Developer:** Prologis suggests changes to Policy SA 5.7 for Ravenside Retail Park to support multi-level logistics development.

### SA5.8: Kenninghall Metals and Waste

3.351 **Transport for London:** Comment as above.

3.352 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

## PL6 Southgate

### SA6.1: Southgate Office Village

3.353 **Transport for London:** Comment as above.

3.354 **Historic England:** Amendments to recognise impacts on heritage assets.

### SA6.2: Barnet and Southgate college

3.355 **Transport for London:** Comment as above.

3.356 **Politicians/Local/National Interest Groups:** The Councillor for Southgate Ward argued that the Local Plan's proposal to consider housing on the Barnet and Southgate College and Alan Pulling Youth Centre sites is inappropriate, as these sites should not have shared uses.

### SA6.3: Michenden Car Park and Alan Pullinger Centre

3.357 **Transport for London:** Comment as above.

3.358 **Politicians/Local/National Interest Groups:** The Councillor for Southgate Ward argued that the Local Plan's proposal to consider housing on the Barnet and Southgate College and Alan Pulling Youth Centre sites is inappropriate, as these sites should not have shared uses.

## PL7 New Southgate

### SA7.1: Former Gasholder, New Southgate

3.359 **Transport for London:** Comment as above.

3.360 **Environment Agency:** Objection due to flood risk.

3.361 **NHS London Healthy Urban Development Unit:** The NHS London Healthy Urban Development Unit notes that sites SA7.1, SA7.3, and SA7.4 are expected to deliver housing within the next five years. They welcome discussions as soon as possible to address how the healthcare requirements for the area will be accommodated following the anticipated population increase.

3.362 Landowner/Developer: Builder Depot Group supports these allocations but suggests updating the land use requirement to explicitly include employment and/or retail uses.

### SA7.2: Aldi, New Southgate (formerly Homebase)

3.363 Transport for London: Comment as above.

3.364 Landowner/Developer: Builder Depot Group supports these allocations but suggests updating the land use requirement to explicitly include employment and/or retail uses.

### SA7.3: Ladderswood Estate

3.365 **Transport for London:** Comment as above.

3.366 **Environment Agency:** Objection due to flood risk

3.367 **NHS London Healthy Urban Development Unit:** Observations regarding delivery of new health infrastructure as above.

3.368 **Landowner/Developer:** New Ladderswood LLP express their support for the allocation but propose amendments to the policy.

### SA7.4: Arnos Grove Station Car Park

3.369 **Transport for London:** Comment as above.

3.370 **NHS London Healthy Urban Development Unit:** Observations regarding health infrastructure.as above.

3.371 **Residents/Businesses:** A number of residents objected to the loss of car parking from the permitted scheme.

### SA7.5: Coppice Wood Lodge

3.372 **Transport for London:** Comment as above.

**PL8 Palmers Green**

### SA8.1: Morrisons, Palmers Green

3.373 **Transport for London:** Comment as above.

3.374 **Historic England:** Comment s regarding the wording around significance of listed buildings.

3.375 **Thames Water:** Ground source protection zone noted.

3.376 **Environment Agency:** The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

### SA8.2: Lodge Drive Car Park

3.377 **Transport for London:** Comment as above.

3.378 **Residents/Businesses:** A number of residents objected to the loss of car parking on the site.

3.379 **Thames Water:** Ground source protection zone noted.

3.380 **Environment Agency:** The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

### SA8.3: Corner of Green Lanes and the North Circular

3.381 **Transport for London:** Comment as above.

3.382 **Environment Agency**: Objection due to flood risk. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.383 **Thames Water:** Ground source protection zone noted.

### SA8.4: Travis Perkins, Palmers Green

3.384 **Transport for London:** Comment as above.

3.385 **Thames Water:** Ground source protection zone noted.

3.386 **Environment Agency:** The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

**PL10 Chase Park**

### SA10.1: Land at Chase Park

3.387 **Transport for London:** Objection due to supporting infrastructure. TfL does not consider the sites at Chase Park (PL10) SA10.1 – SA10.4, Crews Hill (PL11) SA11.1 – SA11.6, land opposite Enfield Crematorium (RUR.01), and land between Camlet Way and Crescent West, Hadley (RUR.02) suitable for housing. This is due to their poor

transport connectivity and the high costs required to provide sustainable transport access comparable to urban sites in the borough. Developing these sites is likely to lead to car-dependent development, which is contrary to the Good Growth objectives of the London Plan and the NPPF.

3.388 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.389 **Sport England:** Objection due to loss of equestrian sports facilities. Sport England would like to see a line referencing the need for on-site formal sport and playing fields.

3.390 **Neighbouring authorities:** Support from HCC Flood, but with comments

3.391 **Landowner/Developer:** Comer Homes supports the allocation of Chase Park, including Vicarage Farm, as a key placemaking area to help meet Enfield's housing targets, particularly for family and affordable housing. Support from the London Diocesian Fund. Concerns from 200 Enfield Road that sites have not been optimised.Landsdown Land, promoting the Trent Park Equestrian Centre support the approach of densities across the site with the higher densities in the parts of the site with best access to public transport and facilities.

3.392 **Politicians/Local/National Interest Groups:** The Enfield Society's concerns about Policy PL10: Chase Park focus on the significant harm that development on both sides of Enfield Road would cause to the semi-rural character of the area and the sense of separation between Enfield Town and Oakwood. They highlight ENPlan's assessment that the high-density, up to 4-5 storey core of the development would have a major adverse visual impact, particularly on high-sensitivity receptors using the London Loop. Additionally, the development would surround the Merryhills Way with housing, compromising its rural character and value as a local open space. The Society also raises concerns about the potential development of the Trent Park Equestrian Centre, which they argue is inappropriate for the Trent Park Conservation Area due to its rural nature. Enfield Road Watch's response to the local plan highlights several concerns. They dispute Design Principle D's characterization of Enfield Road as a "highways dominated space," emphasizing its urban-rural interface and separation between Enfield Town and Oakwood. They question the replacement of the 2021 Green Belt study, arguing the fields south of Enfield Road should qualify as a Site of Importance for Nature Conservation due to their ecological richness. The response also underscores the area's historic significance, criticizes the plan for not respecting local character and design codes, and opposes including Trent Park Equestrian Centre in the development area due to its recreational and historical value.

3.393 **Residents/Businesses:** Residents expressed concern about the lack of consideration for the likely multi-period buried archaeological resources in the development area, particularly prehistoric archaeology evidenced in other parts of Enfield Chase. They recommend that the Masterplan include a comprehensive archaeological assessment based on fieldwork. Additionally, while welcoming the proposal to create a heritage park at the former Slades Hill army camp and AA gun site, they stress the necessity of full archaeological documentation and possible excavation prior to development for effective site interpretation.

### SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)

3.394 **Transport for London:** Objection as above.

3.395 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.396 **Neighbouring authorities:** Support, but with comments

3.397 **Landowner/Developer:** Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2 support the principle of Policy PL10 for Chase Park Placemaking Area, Capel Manor College support the strategic allocation and the critical linkage provided by their site, but expressed concerns about the placemaking diagram. Geras Estates limited support the local plan.

3.398 **Politicians/Local/National Interest Groups:** Enfield Road Watch's response to the Local Plan expresses concerns about the handling of the planning application for Arnold House's demolition. They argue the access road to the proposed Chase Park development was not transparently communicated, potentially harming the Vicarage Farm and Rifles Site SINC, contradicting NPPF Paragraph 185a. Additionally, they claim the area's slope and gradient do not support active travel, making the development unsustainable. The Local Councillor highlights concerns about limited public transport, increased traffic congestion, and significant harm to the area's character and countryside. The development would urbanize the Enfield Chase Area of Special Character, impacting the Trent Park Conservation Area and historic landscape. It also notes the loss of green spaces that contribute to physical and mental health, as emphasized by Historic England. The proposal is deemed unsound and recommended for deletion from the draft plan. The Barnet Society objects to any erosion of the Green Belt, particularly the loss of the green buffer between Barnet and Enfield. This buffer is crucial for maintaining the distinct identities of Barnet, Hadley, Cockfosters, and Enfield Town, preventing their merge into a single suburban area. These countryside areas, especially north and south of Hadley Road and Enfield Road, are vital for preserving the character and separation of these communities.

3.399 **Residents/Businesses:** Numerous objections.

### SA10.3: Chase Park North East

3.400 **Transport for London:** Objection as above.

3.401 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.402 **Thames Water:** Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure.

3.403 **Neighbouring authorities:** Support, but with comments

3.404 **Politicians/Local/National Interest Groups:** Enfield Road Watch's response to the local plan highlights several concerns regarding the extension of Trent Country Park. They argue that Vicarage Farm already serves as an extension to the historic park, preserving its landscape setting and providing wildlife habitats. The creation of new viewpoints would replace valued rural views with urbanized landscapes. Additionally, they emphasize that the topography of site SA10.3 discourages active travel due to slopes and gradients, making it likely car-dependent and thus unsustainable.

3.405 **Residents/Businesses:** Numerous objections.

### SA10.4: Chase Park North West

3.406 **Transport for London**: Objection as above.

3.407 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.408 **Neighbouring authorities:** Support, but with comments

3.409 **Politicians/Local/National Interest Groups:** The Enfield Society raises concerns that new neighbourhoods in areas SA10.3 and SA10.4 are being planned with the assumption of a new bus route through the Country Park extension to meet the 400m maximum distance to a bus stop as required. They argue that proximity to a bus stop does not guarantee effective public transport access, particularly as details about the destinations and frequency of the proposed service are unclear. Additionally, any new service might require passengers to change buses at Chase Farm Hospital, raising doubts about the overall efficacy of the proposed public transport provision. Herts and Middlesex Wildlife trust object to the site allocation.

3.410 **Residents/Businesses:** Numerous objections.

**PL11 Crews Hill**

### SA11.1: Land at Crews Hill

3.411 **Transport for London:** TfL does not consider the sites at Chase Park (PL10) SA10.1 – SA10.4, Crews Hill (PL11) SA11.1 – SA11.6, land opposite Enfield Crematorium (RUR.01), and land between Camlet Way and Crescent West, Hadley (RUR.02) suitable for housing. This is due to their poor transport connectivity and the high costs required to provide sustainable transport access comparable to urban sites in the borough. Developing these sites is likely to lead to car-dependent development, which is contrary to the Good Growth objectives of the London Plan and the NPPF.

3.412 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.413 **Sport England:** Objection due to loss of golf facilities.

3.414 **Neighbouring authorities:** HCC's response highlights that the site contains areas of the main river Turkey Brook, which drains areas of Hertfordshire. Any new outfalls must restrict discharge rates and volumes to greenfield levels to ensure upstream areas in Hertfordshire can drain effectively. The site also includes areas within Flood Zone 2 and 3, and HCC recommends consulting the Environment Agency on any proposals for this site. Hertfordshire County Council (HCC) views the Crews Hill development proposal (PL11, SA11.1-SA11.6) as slightly negative for Hertfordshire's ecology, reducing semi-natural habitats' extent and connectivity. While the current landscape has limited ecological value due to intensive farming, the development may alter mixed land uses and degrade some ecological characteristics but could enhance others through Biodiversity Net Gain initiatives. Potential indirect impacts include increased visitor pressure on Hertfordshire's rural sites. The extent of these impacts depends on the Green Infrastructure (GI) proposals for Crews Hill.

3.415 **Landowner/Developers**: Taylor Wimpey supports the vision for Crews Hill under Policy PL11. Rockwell's concerns with Policy PL11 and its associated site allocation SA11.6 center on its current ineffectiveness and the broader implications for delivery and viability. They emphasize their investment in the ELP and support for the Crews

Hill allocation but express significant concerns regarding the uncertainty surrounding the development of Kings Oak Equestrian Centre, which hinges on obtaining clarity from the London Borough of Enfield (LBE). They argue for the Green Belt release of parts of Crews Hill due to their previously developed status and low contribution to Green Belt purposes. Additionally, Rockwell highlights challenges related to the local centre's delivery, which depends on LBE's agreement, and the problematic long-term lease on Kings Oak Farm, which impedes financing and timely development. They call for clearer policy guidance and LBE's commitment to resolve these issues and ensure the site's effective delivery.

3.416 **Politicians/Local/National Interest Groups**: The Enfield Society is concerned that the proposed 800 homes at the site near Crews Hill will harm the historic and natural landscape. They argue it will suburbanize Owls Hall, a Grade II listed asset, causing substantial harm to its setting. The development breaches the boundary provided by the railway line and extends into open countryside, negatively impacting the scenic quality, tranquillity, and sense of remoteness of Enfield Chase. ENPlan's assessment highlights the significant adverse visual effects and landscape harm this development would cause, suggesting the area should remain undeveloped to preserve its openness.Enfield Road Watch raises concerns about the Local Plan regarding Land North of Cattlegate Road, questioning the feasibility and viability of a new road bridge over the railway and arguing that even with bus access, the potential for sustainable transport is poor. They state that existing trees and buffers are inadequate to preserve the countryside setting and that the development would significantly urbanize the countryside. They also note that heritage impacts on the Grade II listed Owls Hall have not been clearly assessed. The Barnet Society supports concentrating new development around Crews Hill Station and retaining the area's horticultural and food-producing industries. However, they express strong reservations about the commercial viability of Crews Hill's businesses due to rising land values and traffic congestion. They request a commitment in the Plan to protect these businesses. Additionally, they stress the need for significant rail, road, and other transport improvements to accompany any development, noting a lack of detailed proposals for Crews Hill in Enfield's Strategic Policies T1, T2, and T3.

3.417 **Residents/Businesses**: Numerous objections.

### SA11.2: Land South of Cattlegate Road, Crews Hill

3.418 **Transport for London**: Objection as above.

3.419 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.420 **Sport England:** Objection due to loss of playing fields.

3.421 **Neighbouring authorities:** Support, but with comments

3.422 **Landowners/Developers:** London Borough of Enfield Strategic Property Services (LBE SPS) supports the spatial vision and strategic objectives of the draft Local Plan, particularly for Crews Hill. They endorse the inclusion of placemaking areas as key components of the spatial strategy and support the vision for CHPA, advocating flexibility to exceed the 5,500 home target as detailed design progresses. They suggest a unified housing figure across documents, recognize the Council's role in collaboration, and emphasize the importance of phased development and ecological protection. They also recommend a flexible masterplan approach to expedite housing delivery and advocate for clear phasing details and viability considerations.

3.423 **Politicians/Local/National Interest Groups:** The Enfield Society raises several concerns about the proposed development at Crews Hill. They argue that the area, designated as a Borough Site of Importance for Nature Conservation, includes rare acid grassland habitat, making it unsuitable for development. They highlight that the Green Belt Study indicates 'Very High' harm from releasing this area, despite some suggested mitigations. They emphasize the strategic importance of this land, purchased to be preserved as Green Belt, and reference the NPPF's directive to protect valued landscapes, asserting that development would contradict these guidelines and harm the area's historic and recreational value.Enfield Road Watch raises concerns about the proposed development on land south of Cattlegate Road, emphasizing the ecological and historical value of Crews Hill Golf Course and King's Oak Plain. They argue that breaching the strong Green Belt boundary is unjustified and would lead to urban sprawl. The designation of Crews Hill Golf Course as a Grade 1 Borough SINC highlights its unique acid grassland habitat, which is irreplaceable. They question the feasibility of development without harming the ecological integrity of the area, citing conflicting expert opinions on ecological impact.

3.424 **Residents/Businesses:** Lea Valley Growers Association object to the loss of popular garden centers and supporting businesses in Crews Hill for housing development. They advocate enhancing horticultural activities to make it a hub for food and plant production. They argue that Enfield's housing targets can be met on brownfield sites, as evidenced in the "Space to Build" report, which identifies locations for 37,000 homes. They emphasize the Green Belt's value for environmental, ecological, economic, and public health reasons, urging the Council to protect it in line with the London Plan and NPPF. Numerous other objections.

### SA11.3: Land South of M25, Crews Hill

3.425 **Transport for London:** Objection as above.

3.426 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.427 **Neighbouring authorities:** Support, but with comments

3.428 **Landowner/Developer:** The Paddington Corporation, promoters of Homewood Farm, located within Site Allocation SA11.3 'Land South of M25, Crews Hill,' highlighted their site for its potential to support both residential and commercial development. Tile Kiln Farm highlighted their site's potential to support both residential and commercial development

3.429 **Politicians/Local/National Interest Groups:** Enfield Road Watch's response to the local plan for Land South of M25 raises concerns about the proposed 440 new homes likely to be occupied before the Local Centre is established, fostering car-dependency and conflicting with the London Plan's objectives. They question the feasibility and scale of the Local Centre, which may be insufficient for 5,500 homes. The Enfield Characterisation Study highlights the area as part of the historic Theobalds Estate and a "valuable green gateway," deeming it unsuitable for development. The Enfield Society's concerns regarding the development at Crews Hill focus on the impact on the Grade II* listed building, The Paddocks, and its associated barns. Their Heritage Impact Assessment (HIA) indicates that the development would sever The Paddocks from its historical agricultural landscape, causing substantial harm to its setting and significance. The proposed new road and housing would erode the remnants of Theobalds Park, negatively impacting the legibility and understanding of the farmstead. This conflicts with Local Plan policies and NPPF paragraph 206, which requires clear justification for any harm to heritage assets.

3.430 **Residents/Businesses:** Numerous objections.

### SA11.4: Land North and South of Cattlegate Road

3.431 **Transport for London:** Objection as above.

3.432 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.433 **Neighbouring authorities:** Support, but with comments

3.434 **Landowner/Developer**: GF Planning, on behalf of their client confirms the landowners are working together and confirms that the sites are suitable (SA11.5: Land East of Theobalds Road Park, Crews Hill and SA11.4: Land North and South of Cattlegate Road). Wolden Garden Centre Ltd note the site, which includes Wolden Garden Centre, is situated near Crews Hill Railway Station and falls within a broader area designated for around 2,250 new homes, public spaces, and a new local center. The comments highlight concerns about the impact of strategic infrastructure requirements and off-site school construction on development viability, noting that these could affect early phases of the project. They suggest updating the site allocation to offer more flexibility on infrastructure contributions and affordable housing to enhance viability. The company also advocates for including diverse residential uses and higher density development options to optimize the site's potential. They emphasize the importance of a viable and comprehensive development approach for Crews Hill to align with long-term planning goals and ensure the success of the area’s transformation. Lee Valley Growers association objected as above.

3.435 **Politicians/Local/National Interest Groups:** The Enfield Society's concerns about the land north and south of Cattlegate Road in Crews Hill include potential delays in delivering the Local Centre, which could increase car-based trips and affect rural lanes. They question the effectiveness of a comprehensive masterplanned approach due to the complexity and number of landowners. They also highlight the visual impact of taller buildings and the intrusion into views from The Ridgeway. Furthermore, the necessity for exceptional circumstances to introduce new development in the Greenbelt area is emphasized, with a suggestion to consider the vacant site adjacent to the Plough Public House.Enfield Road Watch's response to the local plan for Land North and South of Cattlegate Road raises concerns about the feasibility and effectiveness of the proposal for 2,250 new homes and a new Local Centre. They argue that the policy is unlikely to be effective due to the lack of landowner cooperation and unclear financial resources for land acquisition or compulsory purchase orders (CPO). The response highlights the risk of piecemeal development due to vague phasing timeframes and insufficient clarity on deliverable sites. Concerns are also raised about ecological impacts on the Glasgow Stud SINC and potential disruption to local businesses.

3.436 **Residents/Businesses:** Numerous objections.

### SA11.5: Land East of Theobalds Road Park, Crews Hill

3.437 **Transport for London:** Objection as above.

3.438 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.439 **Neighbouring authorities:** Support, but with comments

3.440 **Landowner/Developer:** GF Planning, on behalf of their client confirms the landowners are working together and confirms that the sites are suitable (SA11.5: Land East of Theobalds Road Park, Crews Hill and SA11.4: Land North and South of Cattlegate Road).

3.441 **Politicians/Local/National Interest Groups:** The Enfield Society's concerns regarding the land east of Theobalds Park Road include potential significant harm to the Glasgow Stud SINC due to unclear development limits, lack of clarity on new green spaces, and potential ineffectiveness due to uncertain landowner intentions. While the creation of a new park near the Whitewebbs Transport Museum is supported, residential development could harm the rural character of Whitewebbs Road. Development should avoid the SINC to maintain ecological integrity, and more detailed plans are needed for clear decision-making.

3.442 **Residents/Businesses:** Numerous objections.

### SA11.6: Land South West of Theobalds Park Road

3.443 **Transport for London:** Objection as above.

3.444 **Environment Agency:** Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

3.445 **Neighbouring authorities:** Support, but with comments

3.446 **Landowner/Developer:** Rockwell London Ltd, a housebuilder with interests in the Crews Hill Allocation (Policy PL11, SA 11.6), supports the plan’s vision for delivering new homes and infrastructure at Crews Hill. They welcome the Green Belt release and the plan’s ambition to create a sustainable new community. Rockwell has engaged with the Council through Developer Forums and is committed to working with other promoters within SA11.6. However, Rockwell raises concerns about the viability of the plan, the timing and scope of the Supplementary Planning Document (SPD), and transparency regarding delivery assumptions. They believe the plan can be improved through modifications, including refining the SPD, reviewing viability evidence, including a detailed housing trajectory, and ensuring continued commitment from Enfield Estates. London Borough of Enfield Strategic Property Services (LBE SPS) highlights the potential of Sunbeam Stud for development within the CHPA, emphasizing its logical location and ability to contribute to Enfield's strategic objectives. They note the site’s omission from the phasing and density plans and recommend its inclusion to optimize housing delivery. LBE suggests the site, which is 7.38 hectares, could support around 369 new homes at a density of 50 dph. They advocate for early development within the plan period and seek a more detailed breakdown of the expected development from the Council.

3.447 **Politicians/Local/National Interest Groups:** The Enfield Society's concerns about the land southwest of Theobalds Park Road include the unclear designation of the Clay Hill Conservation Area in planning maps, with potential removal from the Green Belt. They worry about the proposed development's impact on the rural character of Wildwoods and Flash Lane. Additionally, they fear urbanization along Strayfield Road, which could harm the attractive rural character of the London LOOP and Hertfordshire Chain Walk paths.

**Other sites outside of Placemaking Areas**

***Urban Area***

**Residential Sites**

### URB.01: Land known as Brimsdown Sports Ground

3.448 **Transport for London:** Comment as above.

3.449 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

3.450 **Sport England:** Objection due to potential loss of sports facilities.

### URB.02: Cockfosters Station Car Park

3.451 **Transport for London:** Comment as above.

3.452 **Historic England:** Comment Landowner/Developer: Support, but with comments

3.453 **Residents/Businesses:** Objection due to loss of car parking as a result of the consented scheme.

### URB.03: Former Chase Farm Hospital

3.454 **Transport for London:** Comment as above.

3.455 **Residents/Businesses**: Numerous residents responded raising concerns around the impact of the permitted scheme on the historic clock tower on the site, and other historic buildings.

### URB.04: Blackhorse Tower, Cockfosters Road

3.456 **Transport for London:** Comment as above.

### URB.05 New Avenue Estate

3.457 **Landowner/Developer:** Vistry Group supports the draft site allocation for the New Avenue Estate (SA URB.05) but requests amendments to better reflect existing planning permissions.

### URB.06: Former Middlesex University, Trent Park

3.458 **Historic England:** Comment regarding historic park management plans.

### URB.07: Sainsburys, Green Lanes

3.459 **Transport for London:** Comment as above.

3.460 **Politicians/Local/National Interest Groups:** Objection

3.461 **Residents/Businesses:** Objection

### URB.08: Hoe, Eastfield, Cherry and Bouvier Estates

3.462 **Transport for London:** Comment as above.

### URB.09: Exeter Road Estate

3.463 **Transport for London:** Comment as above.

### URB.10: Alma Estate

3.464 **Transport for London:** Comment as above.

3.465 **Landowner/Developer:** Vistry Group supports the draft site allocation for the Alma Estate (SA URB.10) but requests updates to reflect their ongoing development and potential for 1,404 homes with buildings up to 17-storeys.

3.466 **Politicians/Local/National Interest Groups:** Objection

### URB.11 The Former Royal Chace Hotel

3.467 **Thames Water:** Comments as above.

### URB.12: 241 Green Street

3.468 **Transport for London:** Comment as above.

3.469 **Environment Agency:** Objection due to flood risk.

3.470 **Politicians/Local/National Interest Groups:** Objection

### URB.13: Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate

3.471 **Transport for London:** Comment as above.

3.472 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

### URB.14: Four Hills Estate, Lavender Hill

3.473 **Transport for London:** Comment as above.

### URB.15: Kettering Road Estate

3.474 **Transport for London:** Comment as above.

3.475 **Environment Agency:** Objection due to flood risk.

### URB.16: 188-200 Bowes Road

3.476 **Transport for London:** Comment as above.

### URB.17: Main Avenue Site

3.477 **Transport for London:** Comment as above.

### URB.18: Land at Ritz Parade

3.478 **Transport for London:** Comment as above.

3.479 **Residents/Businesses:** Objection due to traffic impacts.

### URB.19: Albany Leisure Centre and Car Park

3.480 **Transport for London:** Comment as above.

### URB.20: Cuckoo Hall Lane Estate

3.481 **Transport for London:** Comment as above.

3.482 **Environment Agency:** Objection due to flood risk.

3.483 **Thames Water:** Noted need for water supply upgrades.

### URB.21: Moorfield Health Centre

3.484 **Transport for London:** Comment as above.

3.485 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

### URB.22: Oakwood Station Car Park

3.486 **Transport for London**: Comment as above.

3.487 **Landowner/Developer:** Places for London strongly welcome Enfield's inclusion of the Oakwood Station Car Park as a Draft Site Allocation

3.488 **Politicians/Local/National Interest Groups:** The Enfield Conservative Group opposes to the proposal to develop Oakwood Station Car Park for housing, as it represents overdevelopment based on unrealistic housing targets.

3.489 **Residents/Businesses:** Numerous residents objected to the proposals due to the loss of car parking on the site.

### URB.23: Stoneleigh Avenue Estate

3.490 **Transport for London:** Comment as above.

3.491 **Thames Water**: Ground source protection zones noted and need for potential upgrades to water supply network in the area.

### URB.24: Fore Street Estate

3.492 **Transport for London:** TfL welcomes the requirement for the development to contribute towards bus re-routing, future upgrades to bus capacity, and access improvements at Silver Street station to create an accessible route to the platform. They also support the requirement for the development to minimize parking.

3.493 **Thames Water:** Noted need for water supply upgrades and Ground Source protection zone.

### URB.25: Pevency Avenue

3.494 **Transport for London:** Comment as above.

3.495 **Thames Water:** Ground source projection zones noted.

### URB.26: Fords Grove Car Park

3.496 **Transport for London:** Comment as above.

3.497 **Politicians/Local/National Interest Groups:** The Enfield Conservative Group objects to the loss of Ford's Grove Car Park, as it would harm the viability of the Green Lanes area by reducing parking for shoppers.

3.498 **Residents/Businesses:** Residents object to the excessive number and height of proposed dwellings at the site, citing incompatibility with infrastructure and design requirements in SA URB 26. Residents doubt the feasibility of the active travel objective, foresee parking issues, and highlight the negative impact on local businesses due to the loss of the current car park and increased on-street parking.

### URB.27: South Street

3.499 **Transport for London:** Comment as above.

3.500 **Thames Water:** Ground source projection zones noted.

## Industrial Sites

### URB.28 Land to the East of Stockingswater Lane

3.501 **Transport for London:** Comment as above.

3.502 **Environment Agency:** Objection due to flood risk.

3.503 **Landowner/Developer**: Areli Developments Limited welcomes the inclusion of site allocation URB.28 but suggests several clarifications and amendments.

### URB.29 Land to the south of Milmarsh Lane, Brimsdown Industrial Estate

3.504 **Transport for London:** Comment as above.

3.505 **Environment Agency**: Objection due to flood risk.

### URB.30: Montagu Industrial Estate

3.506 **Transport for London**: Comment as above.

3.507 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

3.508 **Thames Water:** Ground source protection zones noted and need for potential upgrades to water supply network in the area.

3.509 **Landowner/Developer:** Support, but with comments

### URB.31: Snowbird Foods Extension

3.510 Transport for London: Comment as above.

3.511 Thames Water: Ground source protection zones noted and need for potential upgrades to water supply network in the area.

### URB.32: Claverings Industrial Estate

3.512 **Transport for London:** Comment as above.

3.513 **Environment Agency:** Objection due to flood risk.

3.514 **Landowner/Developer:** While Danescroft supports the redevelopment principle, they identify conflicts with the Council's design principles, citing boundary inconsistencies, level differences, and unrealistic intensification targets.

### URB.33: 6 Morson Road

3.515 **Transport for London:** Comment as above.

3.516 **Environment Agency:** Objection due to flood risk.

### URB.34: 5 Picketts Lock Lane

3.517 **Transport for London**: Comment as above.

3.518 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

3.519 **Landowner/Developer:** Whilst CCLA/LAMIT is supportive of the allocation for industrial uses, the emphasis on ‘intensification’ and specifying an uplift in floorspace of 2,297sqm is deemed inappropriate and unjustified in the context of the NPPF tests of Soundness.

### URB.35 River Walk Business Park

3.520 **Thames Water:** Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure.

3.521 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

**Other uses**

### URB.36: Church Street Recreation Ground

3.522 **Transport for London:** Comment as above.

3.523 **Sport England:** Objection due to loss of sports facilities/playing fields.

3.524 **Environment Agency:** Note that the site is in a Ground Source Protection Zone and there are requirements associated with this particularly in relation to burial uses.

3.525 **Politicians/Local/National Interest Groups:** Objection from Enfield’s Conservative Group on the basis the development would contravene the NPPF due to loss of open space, traffic and safety and environmental risks. They also question the need for a new facility. The Edmonton and Winchmore Hill Conservative Association objects to the proposal for a crematorium on Church Street Recreation Ground, arguing it fails to meet soundness criteria due to its adverse impact on the community, policy conflicts, and insufficient infrastructure planning. Bush Hill Park Residents Association object to the inclusion of The Church Street Recreation Ground, as it is designated as Metropolitan Open Land, should receive the same level of protection as Green Belt land.

3.526 **Landowners/Developers:** LBESPS supports the allocation of Church Street Recreation Ground (SA URB.36) for a crematorium, emphasizing the importance of detailed design.

3.527 **Residents/Businesses:** Residents object to Policy URB.36 concerning Church Street Recreation Ground, arguing that it is metropolitan land and should have the same protection as green belt land. They believe that any development on this site would undermine its protected status and compromise the integrity of this valuable green spac

***Outside of Placemaking Areas - Rural***

**Residential Sites**

### RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road

3.528 **Transport for London:** Comment as above.

3.529 **Landowner/Developer:** Forty Leisure Limited and Jubilee Church are supportive of the Local Plan's allocation of Site SA RUR.01 (Land Opposite Enfield Crematorium).

3.530 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

3.531 **Local Interest Groups:** The Enfield Society's concerns regarding the proposed development on this Green Belt and open space site highlight the inconsistency with London Plan Policy G1, which protects such areas. They question the adequacy of the heritage impact assessment, especially regarding views from Forty Hill Conservation Area, and the lack of detailed evidence, such as Vucities modelling. Additionally, concerns are raised about the delayed implementation due to potential environmental permits, suggesting that an earlier survey could clarify the timeframe for delivering the proposed 291 dwellings.

### RUR.02: Land between Camlet Way and Crescent West, Hadley Wood

3.532 **Transport for London:** Comment as above.

3.533 **Neighbouring authorities:** LB Barnet is concerned that this development could detrimentally affect the Green Belt's openness.

3.534 **Landowner/Developer:** The Dutchy of Lancaster supports the draft plan and the the site allocation with comments. LBESPS supports the allocation of land between Camlet Way and Crescent Way (SA RUR.02) for new homes, emphasizing sustainable design that respects the surrounding Green Belt and SINC. They endorse early engagement with Historic England and Thames Water due to the site's location in an Archaeological Priority Area and potential wastewater network upgrades. They agree with the estimated capacity of 160 new homes and the 10-year development timeframe. The site is seen as a deliverable location that can significantly contribute to the Borough's housing needs and should be prioritized for residential development.

3.535 **Politicians/Local/National Interest Groups:** The Enfield Conservative Group, Neighbourhood Planning Forum other local interest groups such as the Barnet and Enfield Societies submitted extensive objections to the site's release from the green belt for residential development, questioning the exceptional circumstances and sustainability of the site.

3.536 **Residents/Businesses:** Residents submitted extensive objections to the site's release from the green belt for residential development, questioning the exceptional circumstances and sustainability of the site.

## Industrial Sites

### RUR.03: Land west of Rammey Marsh

3.537 **Transport for London:** Comment as above.

3.538 **Environment Agency**: Objection based on incorrect flood zone mapping.

3.539 **Lee Valley Regional Park Authority:** Support, but with comments

3.540 **Neighbouring authorities:** Broxbourne Borough Council has raised concerns about the accuracy of Enfield's traffic modelling, especially regarding the impact of 5,500 new dwellings at Crews Hill and the proposed employment allocation west of Rammey Marsh. Broxbourne's previous transport modelling indicated that several junctions would be operating at or near capacity by 2033, which contrasts sharply with Enfield's lower congestion projections. Broxbourne fears this discrepancy may undermine planned transport interventions on the A10 and result in severe highway impacts, making this part of the Local Plan unsound. HCC questions whether a mitigation measure at J24 of the M25 is needed to handle growth and increased HGV traffic from the industrial allocation RUR.04 Land East of Junction 24 and welcomes discussion on this. They express concerns about increased traffic volumes and delays on the A10 and A1010 due to industrial allocations off Mollison Avenue (RUR.03 and RUR.05), noting these routes are designated Air Quality Management Areas (AQMAs) and face severe congestion, especially when the M25 is delayed or closed. HCC expects these issues to be investigated through applicable planning applications and supports integrating wording into the plan to ensure this investigation is a policy requirement.

3.541 **Politicians/Local/National Interest Groups**: Enfield Road Watch objects to SA RUR.03: Land West of Rammey Marsh because the land is currently designated as Green Belt and is part of the Lee Valley Area of Special Character. They emphasize that the area is rich in wildlife and argue that further ecological surveys are needed to understand its significance better. CPRE London opposes the development of Green Belt land west of Rammey Marsh (SA RUR.03), highlighting its significance to the Metropolitan Green Belt and asserting that Enfield has sufficient brownfield land and existing major sites like Meridian Water for housing development. They emphasize that this protected Green Belt land is designated as part of the Lee Valley Area of Special Character and should not be included as a site allocation.

3.542 **Residents/Businesses:** Objection due to loss of Green Belt.

### RUR.04: Land east of Junction 24, M25

3.543 **Transport for London:** Comment

3.544 **National Highways Limited**: Objection

3.545 **Neighbouring authorities:** HCC's response notes that the proposal for industrial use at SA RUR.04, an arable field within a farmed landscape, is incongruous with its agricultural and landscape context and damaging to the local environment's character. Despite this, there appear to be no ecological constraints locally or within Hertfordshire.

3.546 **Politicians/Local/National Interest Groups:** CPRE London opposes the development of Green Belt land at M25, Junction 24 (SA RUR.04), emphasizing its importance to the Metropolitan Green Belt and arguing that Enfield has sufficient brownfield land and existing major sites like Meridian Water for housing development. They assert that development would harm the green gateway to the Borough and that this land, designated as Green Belt, should not be included as a site allocation. Enfield

Road Watch objects to SA RUR.04: M25 Junction 24 (The Ridgeway, near St John's School) due to its current designation as Green Belt countryside and an Enfield Chase Area of Special Character within the statutory Development Plan. They argue that the proposed industrial, storage, and distribution center would destroy the farm fields and countryside views that create a green gateway to the borough.

3.547 **Residents/Businesses:** The Hadley Wood Neighbourhood Planning Forum (HWNPF) raises concerns about the proposed 30,000m² logistics hub on Green Belt land near junction 24 of the M25 (site RUR.04). They argue that its isolated PTAL 1a location means workers will predominantly commute by car, contributing to car dependency. Additionally, given its location in a corner of the borough, the development is likely to benefit residents of Hertsmere, particularly Potters Bar, more than those in Enfield. HWNPF believes the proposal is driven by financial motives rather than genuine employment needs.

### RUR.05: Land to the north west of Innova Park

3.548 **Transport for London:** Comment

3.549 **Environment Agency**: The Environment Agency notes that development on historic landfills may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

3.550 **Lee Valley Regional Park Authority:** Support, but with comments

3.551 **Neighbouring authorities:** Support, but with comments

3.552 **Landowner/Developer:** Thames Water supports the allocation of the former Thames Water Rammey Marsh Sewage Sludge beds (SA RUR.05) for employment development and agrees with its removal from the Green Belt, and propose amendments to the policy.

3.553 **Local Interest Groups:** The Enfield Society's concerns about the site in the Green Belt highlight that the need for proposed employment uses has not demonstrated the required 'exceptional circumstances' for Green Belt release. The proposed 39m tall buildings are not justified for the intended employment uses. Additionally, Design Principle C should mandate, rather than suggest, the maintenance of a pedestrian connection parallel to the watercourse towards the Small River Lea.

### RUR.06: Land at Picketts Lock

3.554 **Transport for London:** Comment

3.555 **Environment Agency**: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

3.556 **National Grid:** National Grid has reviewed the ELP and identified that several proposed development sites, including RUR.06 (Land at Picketts Lock), SA5.2 (Meridian Water Phase 2), and SA5.6 (Meridian East - Harbet Road), are crossed or in close proximity to NGET assets. They propose modifications to include site-specific criteria, such as a strategy for responding to NGET overhead transmission lines, ensuring the NGET Design Guide and Principles are applied during masterplanning to reduce the impact through good design.

3.557 **Lee Valley Regional Park Authority:** Support, but with comments

3.558 **Neighbouring authorities:** Support, but with comments

3.559 **Landowner/Developer:** The Wave generally supports the Local Plan as it pertains to their activities but has concerns about the wording of policy SA RUR.06, deeming it unjustified. They suggest specific modifications to address these issues, aiming to make the policy more sound.

**Other Uses**

### RUR.07: Whitewebbs Golf Course

3.560 **Transport for London**: Comment as above.

3.561 **Environment Agency:** Objection due to flood risk.

3.562 **Sport England:** Objection due to loss of playing fields and other sport facilities.

3.563 **Neighbouring authorities:** HCC's response is neutral with observations.

3.564 **Landowner/Developer:** Support, but with comments. Tottenham Hotspur FC (THFC) request extending the allocation to include additional land and updating references to the former Whitewebbs Golf Course. They support the proposed land uses but suggest clarifying terms and aligning the estimated delivery timeframe with current developments. THFC also suggests modifying design principles to account for practical constraints, such as limiting public access in professional sporting areas and ensuring feasible pedestrian and cycle connections. LBESPS supports the allocation and emphasize the importance of discussions with Sport England and Tottenham Hotspurs, as well as with Historic England due to nearby heritage assets. They support biodiversity enhancements and sustainability-led design. They endorse the proposed development timeframe of up to 10 years, considering the site deliverable and prioritizable for development.

3.565 **Politicians/Local/National Interest Groups:** Enfield Road Watch's objection to SA RUR.07 highlights the Judicial Review challenging Enfield Council's decision to lease land to Tottenham Hotspurs, which they argue compromises the open parkland character and historic value of Whitewebbs. They also emphasize that the Green Belt status makes development inconsistent with national policy, criticize the vague goals regarding public access and heritage assets, and note a shift from nature recovery to sport and leisure uses.

3.566 **Residents/Businesses:** A large number of residents objected to proposals to convert Whitewebbs golf course into a professional sports facility. They argue that the land, bought with public funds in 1931 and designated as public trust land, should remain open to the public. They believe the council’s portrayal of the need for “restoration” is misleading. They also raise legal and ethical issues, stating that the proposal would limit public access and primarily benefit a single corporation. They suggest that the land should remain public and be designated as a natural reserve. They also question the ethical validity of biodiversity offsetting and the overall environmental impact of the proposal. They argue that the proposal is neither legally compliant nor sound and call for a review of the proposal.

### RUR.08: Sloemans Farm

3.567 **Environment Agency:** Note that the site is in a Ground Source Protection Zone and there are requirements associated with this particularly in relation to burial uses.

3.568 **Neighbouring authorities:** Support, but with comments. HCC's response, which is neutral, highlights that the site is adjacent to the main river Cuffley Brook. Surface water runoff must be managed on-site to ensure that any discharges to Cuffley Brook are restricted, preventing any hindrance to upstream flows.

3.569 **Landowner:** LBESPS supports the allocation of Sloeman's Farm (SA RUR.08) for natural burial use. They endorse the proposed land use, infrastructure requirements for enhanced pedestrian and cycle connectivity, and the development timeframe of up to 5 years. They consider the site deliverable and prioritizable for development.

3.570 **Local Interest Groups:** The Enfield Society supports additional burial space, provided it minimally impacts the character of Whitewebbs Lane and the open landscape within the sensitive Enfield Chase Area of Special Character. They seek clarity on design principals argue that ancillary buildings, as mentioned in Design Principle G, are inconsistent with Green Belt policy and should not affect the rural character of Whitewebbs Lane.

3.571 **Residents:** One resident objected to the burial needs assessment and case for additional burial space at Sloeman's Farm.

### Omission Sites

3.572 A number of respondents utilised the opportunity to make a call for sites submission via the Regulation 19 Consultation to further promote additional sites to the council for consideration as part of the Local Plan.

# Appendix A: Regulation 18 Consultation Summaries

## Schedule A1: Details of consultation undertaken under Regulation 18

### Regulation 18: Growth Scenarios – December 2015

A1. In 2016 the Council prepared the document 'Consultation on a New Plan for Enfield 2017-2032', which introduced the major issues facing the borough including around housing, jobs and community facilities. It also set out a series of options for how the borough could grow and develop. This first stage Local Plan document underwent public consultation between Friday 18 December 2015 and Friday 12 February 2016. The consultation sought views on the Local Plan options and asked for respondents to set out their alternative ideas. The consultation also included a call for sites, requesting submission of locations for development from interested parties.

A2. The Council used a wide range of media, events and meetings to inform individuals and organisations about the Local Plan and seek comments. The Council's website supported the consultation through a dedicated webpage, including a link to a PDF copy of the consultation document and a link to the online survey. Notification was made at the start of the consultation to a wide range of individuals and organisation by email and letter. Local MPs were informed by letter, and all Enfield Council Members were informed via the regular weekly e-newsletter. Printed copies of the Local Plan document, along with packs of flyers, were provided in the Council's Civic Centre on Silver Street and in the borough's libraries. Articles were carried in the local media in advance of the consultation, including in the Enfield Independent and Enfield Gazette newspapers on 4th November 2015. A series of pre-publicised, open events were held in Enfield's libraries for members of the public to discuss the Local Plan consultation with Council Officers and to provide feedback. The dates and locations of these drop-in events are shown in the table below.

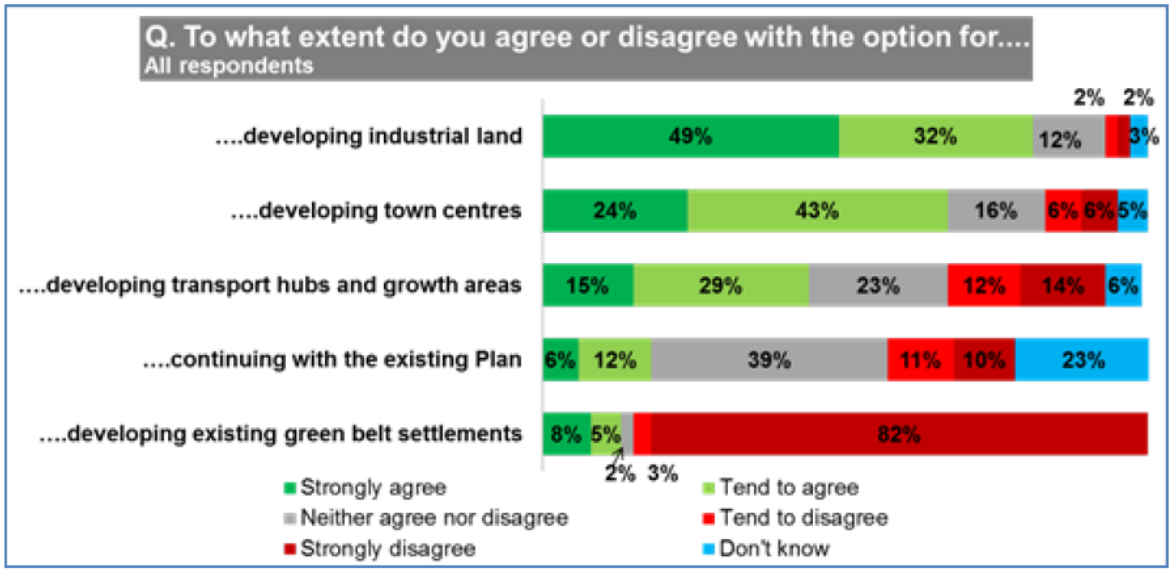
**Table A1: Enfield Local Plan Regulation 18 public consultation events held in 2016**

| Event Location | Date |
|---|---|
| Enfield Town Library | 7th Jan 2016 |
| Palmers Green Library | 14th Jan 2016 |
| Edmonton Green Library | 21st Jan 2016 |
| Ordnance Unity Centre | 28th Jan 2016 |
| Enfield Town Dugdale Centre (weekend) | 30th Jan 2016 |
| Palmers Green Library (evening) | 2nd Feb 2016 |

A3. A total of 1,012 consultation responses were received. The majority (915) were submitted via an online survey, with other responses submitted via email, letters, and paper copy surveys. Respondents could select up to three options. Analysis of the responses shows some high-level outcomes and themes: a preference for developing industrial land (87%), followed by developing at town centres (60%),

developing at transport hubs and growth areas (37%), developing at existing green belt settlements (12%), and to continue with the existing local plan (11%). Further questions were asked to provide insight to the strength of opinion on each scenario. The results are display in the chart below:

**Figure 1.1: Responses to first Regulation 18 consultation on options for developing different parts of the borough**



## Regulation 18: Issues and Options – December 2018

A4. From 5 December 2018 to 28 February 2019 the Council consulted on an issues and options version of the Local Plan. The team also carried out a call for sites consultation to identify future development sites. This Regulation 18 document focussed on exploring broad issues and options but did not indicate the Council's preferred approach, in terms of the scale of growth to be planned for, or in terms of the proposed spatial strategy. During this time the Examination in public for the London Plan commenced (15 January 2019) and concluded on 22 May 2019.

A5. The "Issues and Options" consultation document set out the key challenges and opportunities in Enfield Borough, including in terms of meeting future housing needs, supporting local economic growth and maintaining and enhancing community facilities and areas of open space. Some options for accommodating future growth were also outlined, alongside some draft policy wording. The consultation ran for a 12-week period between 6th December 2018 and 28th February 2019. To ensure that all interested parties were given the opportunity to understand and respond to the consultation in late 2018/ early 2019, the Council undertook a comprehensive programme of engagement and consultation relating to the December 2018 "Issues and Options" document. This consultation followed, and in many cases exceeded, the Council's own standards for public engagement as set out in the adopted Statement of Community Involvement 2015.

A6. Respondents were able to view all consultation material on the Council's online consultation portal and were able to submit representations via the online consultation portal, by e-mail, or by post. Reference copies of the consultation material were also placed in several public locations, where residents were able to inspect documents and find paper copies of the representation forms. Upon reasonable request, the Council did also provide individual copies of documents to those who could not reasonably access the consultation material through standard means. 1,600 subscribers to the Council's planning mailing list were notified of the consultation opportunity by email, and these subscribers also received 'reminder' emails during the course of the consultation period.

A7. The Council's planning mailing list consists of various local residents, businesses, developers and agents who have expressed an interest in receiving planning-related updates from the Council. Promotional posters were also produced to promote the consultation opportunity, and these were displayed on noticeboards across the Borough. Posters were also distributed for display at local leisure centres, doctors' surgeries and private gyms. Smaller flyers were also produced; these were distributed at local events including business networking events and public drop-in sessions.

A8. A prominent banner was placed on the front page of the Council's website directing visitors to webpages explaining the consultation process and outlining opportunities for readers to have their say. These webpages were also promoted through hyperlinked logos in Council email signatures, direct email bulletins to subscribers to the Council's planning mailing list, and other direct communications with members of the public. Furthermore, digital 'banners' were displayed on television screens located in Council reception areas, alerting visitors to the consultation opportunity and how they could get more information. The Council used its official social media accounts on LinkedIn, Twitter and Facebook to promote the consultation opportunity.

A9. The consultation was covered by local media throughout the three month consultation period, including press releases from the Council to advertise forthcoming drop-in events. The Council sought to directly engage with identified

hard-to-reach communities who are typically underrepresented in the consultation process. This included direct engagement with the Turkish community through letters and face-to-face communication, as well as placing promotional material in school newsletters at the College of North East London and Barnet and Southgate College. A further important strand of the consultation and engagement process was a series of public drop-in sessions, held across the Borough in community halls, schools, libraries and churches. The location and timing of each event, along with the number of people who attended, is set out as Appendix A to this Consultation Statement.

**Table A2: Enfield Local Plan Regulation 18 public consultation and focused workshop events held in 2018 and 2019.**

| | Public drop-in sessions | When & Time | Number of attendees |
|---|---|---|---|
| Area ward forums | Enfield West: Southgate and Cockfosters joint area ward forum at Garfield Primary School | 27 November 2018 at 7:30-9:30pm | 50 |
| | Enfield East: Edmonton Green, Upper Edmonton, Lower Edmonton and Haselbury at Community House | 28 November 2018 at 8-9:30pm | 50 |
| | Jubilee area ward forum at Forest Road Health Centre | 5 December 2018 at 7-9pm | 8 |
| | Enfield West joint area forum: Bowes, Palmers Green, Winchmore Hill and Grange at Friends Meeting House | 16 January 2019 7:30-9:30pm at | 50 |
| | Enfield Town and Highlands at Enfield Civic Centre | 17 January 2019 at 7:30-9:30pm | 25 |
| | Enfield North joint area ward forum: Chase, Turkey Street, Enfield Lock, Highway, Southbury, Town and Highlands at Ordnance Unity Centre | 6 February 2019 at 7:30-9pm | 20 |
| | Ponders End area ward forum at The Qube | 19 February 2019 at 7-8:30pm | 35 |
| Drop in sessions | Ponders End Library, 645 Hertford Road | 29 January 2019 at 11-2:30pm | 20 |
| | Vincent House, 2E Naggs Head Road | 29 January 2019 at 3-6pm | 10 |
| | Dugdale Centre, Enfield Town | 5 February 2019 at 12-2pm | 20 |
| | Enfield Civic Centre | 7 February 2019 | 100 |
| | Edmonton Green Library | 12 February 2019 at 3-6:30pm | 20 |
| | Palmers Green Library | 19 February 2019 at 11:30-2:30pm | 50 |

## Breakdown of responses

A10. In total, 1,712 unique responses were received to the “Issues and Options” consultation in late 2018/ early 2019:

- 54 from landowners, developers or planning agents;
- 2 from neighbouring local authorities;
- 20 from government agencies and other public bodies;
- 15 from interest groups and trusts;
- 996 from community associations and local action groups (where they are responding as an organisation on behalf of their members);
- 618 from the consultation portal; and
- via post

## Summary of feedback by theme

<u>Spatial Strategy (Green Belt versus Brownfield Development)</u>

- Some respondents indicated that the need to deliver more affordable housing justified development in the Green Belt.

- Many respondents were against release of Green Belt land to meet development needs.
- Many respondents expressed a preference for use of brownfield sites to meet the development needs of the Borough, with support for higher development densities. Other expressed a preference for lower density developments within urban areas.
- Many of the objections to particular potential development sites in the Green Belt were from those that lived in the immediate vicinity.
- Other respondents recognised the need to strike a balance between protecting the Green Belt and meeting future housing needs (in particular the need for more affordable housing).

Housing

- Lack of clarity around the housing target for the Borough – with some respondents suggesting the assessment of housing need was flawed, and a lower housing target should be set, and others arguing for an increased housing requirement for the Borough.
- Concern around the affordability of housing, with most respondents agreeing that the Council should seek to deliver as much affordable housing as possible.
- Need for more family housing, and more housing for “downsizers”.
- New housing should be for existing residents of the Borough (and not be provided to accommodate overspill from the rest of London/ elsewhere).
- More use should be made of empty homes.
- Gypsy and traveller accommodation is not required.

Design and Heritage

- Development should avoid harm to heritage assets.
- Enfield should retain its character.
- Whilst many respondents supported the increased densification of the urban area in order to safeguard the Green Belt, there were equal concerns regarding the impact of more infill development at higher densities on the character of existing communities and in particular the loss of open spaces within settlements.
- Concerns around high development densities and tall buildings, in relation to the impact on heritage assets.

Economy

- Investment should be focused on the knowledge based economy.
- Provision of high speed broadband will support jobs and businesses.
- Need for more accommodation for smaller businesses.
- Need for more industrial space.
- Lots of empty offices in the Borough (suggesting there is no demand for more office stock).
- Some stakeholders suggested that a more flexible approach should be taken to land use zoning, allowing residential uses in industrial areas, and vice versa.
- Need to take into account the planning issues arising from more home-working.

Town Centres and High Streets

- Need to recognise changes in shopping patterns, in particular the increase in internet shopping.
- Need for more diversity in the range and quality of shops in the Borough.

Community and Social Infrastructure

- Current infrastructure is inadequate, especially public transport, hospitals and schools.
- Insufficient infrastructure capacity to support proposed development.
- Link between affordable housing provision and the key workers needed to provide local social services.
- Importance of ensuring new and improved social infrastructure is delivered by (and alongside) new development.
- Local Plan should provide greater certainty about the location and delivery of new schools.

Transport and Movement

- Need for improved public transport.
- The needs of pedestrians and cyclists should be prioritised.
- Significant existing infrastructure capacity issues need addressing before new development is delivered.
- Concerns around new development impacting on parking availability for existing residents.

Green and Blue Infrastructure

- The canals and waterways represent a significant, under-exploited, opportunity.
- Objection to development that would impact on the Green Belt, Metropolitan Open Land and open space.
- Provision needs to be made for burial space (providing for the different needs of different parts of the local community).
- Concerns around air quality in the Borough, both in terms of its impact on human health and in terms of its impact on habitats and protected species.
- The Local Plan should deliver net gains for the natural environment.

A11. Alongside the comments received from local residents, detailed comments were received on the emerging spatial strategy options and draft policy wording from organisations including the Greater London Authority, Transport for London, Natural England, Environment Agency, Historic England, Enfield Sport and the London Wildlife Trust.

## Regulation 18: Preferred Approaches – June 2021

A12. Following the publication of the conclusion of the London Plan Examination in Public and the Publication of the Panel Report in October 2019, the Mayor published the Intend to Publish Version of the London Plan in December 2019. The Intend to Publish London Plan was laid before the London Assembly in February 2020. The Secretary of State directed changes to the London Plan in March and December 2020 and confirmed in January 2021 that he was content for the London Plan to be formally published. The London Plan was then published in March 2021. Following on from this, from June to September 2021 Enfield Council consulted on the main issues and preferred approaches for the Local Plan and also carried out a further call for sites consultation to identify future development sites. A further Regulation 18 consultation was considered necessary to:

- explore issues identified through the earlier Regulation 18 consultation;
- respond to changes in context, including: government planning policy; the climate and ecological emergencies, COVID, and the recently adopted New London Plan;
- reflect the new and updated technical evidence base; and
- identify a preferred spatial growth strategy and preferred policy options.

A13. Consultation on the draft ELP took place over a 12-week period, exceeding the statutory minimum and the requirements of the adopted Statement of Community Involvement. The consultation was promoted to the 1,600 subscribers to the ELP consultation database, and a dedicated web page was set up to host key consultation documents and publicise ways to get involved. Insofar as coronavirus arrangements allowed, copies of the draft ELP and key supporting documents were placed in Council libraries.

A14. A digital advertising campaign, encompassing Facebook, Twitter and YouTube, was used to publicise local plan consultation to those who live, work and study in Enfield. The consultation was also promoted extensively in the Council's suite of newsletters. Press adverts were placed in several local newspapers, in English, Greek and Turkish.

A15. In order to engage with 'hard to reach' groups, specific efforts were made to target the south and east of the borough through digital advertising, and a number of voluntary and community groups were specifically targeted for engagement. Particular attention was paid to reaching out to young people, through workshops with Enfield Youth Parliament, Oasis Hadley Academy, Enfield Grammar, and Alan Pullinger Youth Centre. A number of workshop sessions were held with voluntary groups and businesses throughout the consultation period, including Enfield Sport, Local Estates Forum, Enfield Food Alliance, Friends of Parks, WENTA, and the Enfield Caribbean Association. In addition, drop-in sessions were held at Palmers Green, Ordnance Road, and Edmonton Green.

A16. In total, 7,267 written responses were received, the vast majority (7,098) from individuals. Most responses were received by email, with approximately one third by letter. Of the individual responses received, 87% originated from Enfield postcodes, with 4% from the rest of London, and the remainder from outside London. Most of the Enfield responses received (41%) came from EN2. 18% originated in EN4, 16% from N21, whilst 2% came from N18 and N9.

## Consultation workshops

A17. A number of consultation workshops were held throughout the consultation period. A flexible approach was adopted to meet the needs of the consultees and the evolving coronavirus situation. Many groups had adapted to the Government's social distancing requirements by convening online meetings. Presentations given at these sessions followed the format of a brief introduction to the draft ELP, highlighting the need for a plan, main challenges and opportunities, and key themes. This was followed by a Q&A which provided an opportunity for a more wide-ranging discussion. Where in-person sessions were permitted, a more tailored approach was followed. The following table provides a summary of draft ELP workshops undertaken as part of Local Plan consultation:

**Table A3: Enfield Local Plan Regulation 18 focused workshop events held in 2021**

| Workshop participant | Method of engagement | Date |
|---|---|---|
| Enfield Youth Parliament pre-consultation engagement[1] | Online | 09/02/2021 |
| Oasis Hadley Academy | In-person | 01/07/2021 |
| Enfield Grammar year 10 student council | In-person | 14/07/2021 |
| Enfield Sport AGM | In-person | 15/07/2021 |
| Youth Centre session | In-person | 19/07/2021 |
| Overview and Scrutiny Committee | In-person | 20/07/2021 |
| Environment Forum - workshop | In-person | 27/07/2021 |
| Local Estates Forum | Online | 27/07/2021 |
| Enfield Food Alliance | Online | 28/07/2021 |
| Enfield Faith Forum | Online | 28/07/2021 |
| Friends of Parks and VCS | Online | 03/08/2021 |
| Customer Voice | Online | 18/08/2021 |
| WENTA business session | In-person | 17/08/2021 |
| Industry in Enfield workshop - agents, landowners and developers | Online | 07/09/2021 |
| Enfield Caribbean Association | Online | 09/09/2021 |
| Industry in Enfield workshop - businesses | Online | 09/09/2021 |
| Enfield Youth Parliament | Online | 20/09/2021 |

## Drop-in Consultation Sessions

A18. In addition, drop-in sessions at local libraries and an outdoor community event were held during the consultation period to allow residents and other interested persons to view the draft Local Plan and supporting evidence, ask questions to Council officers, and share their views.

A19. The drop-in sessions could only be arranged after coronavirus regulations were amended in the summer, as libraries' risk assessments indicated that public consultations could not be held in libraries until restrictions were lifted.

A20. Three locations were chosen to encompass a large geographical area, providing good coverage of the borough. Sessions were held at Palmers Green Library, Ordnance Unity Centre Library, and Edmonton Green (part of the 'Month of Sundays' event). The catchments of Palmers Green, Ordnance Road and Edmonton Green events together cover a large geographical area of the borough. Residents were free to attend any of the events, and no one was excluded.

A21. As the events were drop-in sessions a register was not taken. The drop-in session format enabled members of the public to turn up without an appointment and engage in informal dialogue with officers and other visitors. However, a tally of visitors was taken:

- approximately 40 attendees for the morning and evening sessions at Palmers Green Library on 17 August;
- approximately 30 attendees for the Edmonton Green 'Month of Sundays' event on 22 August; and
- 35 attendees for the morning and evening sessions at the Ordnance Unity Centre on 26 August.
- A pre-consultation engagement session was also held with Enfield Youth Parliament on key priorities for the new Local Plan.

## Consultation Responses - Summary

A22. Most comments received related to housing delivery, the impacts of new development, and the proposed limited release of Green Belt sites. In addition, several proposed site allocations attracted several responses. The key themes identified were as follows:

- Support and concerns of the need for additional housing
- Support and concerns of the Appropriateness of preferred housing target
- Support for proposed affordable housing targets
- Concerns around deliverability of affordable housing targets
- Opposition and support for Green Belt release
- Opposition to tall buildings – especially in Enfield Town
- Need to ensure sufficient infrastructure to support the level of growth proposed.

- Support and opposition to Chase Park and Crews Hill policies and site allocations (draft policies PL9 and PL10 and draft Site Allocations SA27 and SA28)
- Loss of large format food stores and associated car parking
- Opposition to the proposed development of Firs Farm Recreation Ground (SA59), Sainsburys Green Lanes (SA32), and Land between Camlet Way and Crescent West, Hadley Wood (SA45).

**Table A4: Summary of comments by theme**

| Theme | Summary of comments |
|---|---|
| *Support and concerns of the need for additional housing* | • Support from respondents for housing development and the ambition to meet Enfield's housing needs. However, quantitative assessments of need were questioned, in particular noting the possible impacts of Brexit and the Covid-19 pandemic.<br>• Concerns from respondents about the negative impacts of the addition of new homes on the character of the borough, specifically the pleasant and quiet environment of many parts of Enfield.<br>• On the other hand, several respondents welcomed the prioritisation of well-connected brownfield sites (i.e. urban placemaking areas), as these would deliver benefits (including crime reduction) resulting from greater residential population.<br>• Several respondents suggested alternative locations which could accommodate more homes – including redundant commercial sites and Meridian Water.<br>• Benefits arising from an increased supply of new homes were raised by several – including a reduction in the number of households being forced to rent, reduction in households in temporary accommodation, greater ability for local people to stay in the borough, increased housing choice, reduction in waiting lists, and benefits for young people. |
| *Support and concerns of the appropriateness of preferred housing target* | • Support from a wide range of organisations for the preferred option of delivering 25,000 new homes.<br>• However, concerns were also expressed from respondents that the plan's housing target does not meet the requirements of the Government's Standard Methodology and questioned whether the plan is 'sound' as a consequence.<br>• Similarly, some support from respondents was expressed for a higher target, given significant housing needs and historic Housing Delivery Test (HDT) results. Related to this, some respondents flagged implications of Enfield not meeting housing needs on neighbouring local authorities.<br>• Suggestions were made by respondents that an intermediate housing target option between 25,000 homes and 55,000 homes should have been tested through the Sustainability Appraisal process to ensure all reasonable alternatives had been considered.<br>• Some respondents argued that the proposed approach to setting the housing target did not comply with the approach set out in London Plan (2021) paragraph 4.1.11.<br>• Other respondents argued that that Covid-19 and Brexit would affect future population growth, with implications for the preferred housing target. |

| Theme | Summary of comments |
|---|---|
| *Support for proposed affordable housing targets* | • There was widespread support for building more affordable homes to tackle homelessness and wealth divides, and for securing at least 50% of new homes as genuinely affordable.<br>• Several respondents argued that new development should not 'price out' local people, and as a consequence welcomed the 50% affordable housing target.<br>• Specific support was expressed by respondents for the affordable housing target on Green Belt sites. |
| *Concerns around deliverability of affordable housing targets* | • Several respondents raised concerns that residential development on Green Belt sites and Meridian Water would not provide sufficient provision of affordable housing.<br>• Some respondents expressed support for a more 'realistic' target to be stringently enforced.<br>• Several respondents raised the issue of viability and the need for flexibility when it comes to affordable housing requirements.<br>• Some respondents cautioned that affordable housing aspirations should be balanced against site specific circumstances, including the need for development to secure wider community benefits. |
| *Opposition and support for Green Belt release* | • Strong support from respondents was expressed for a 'brownfield first' approach, only using Green Belt sites as a last resort. However, several respondents questioned whether enough had been done to fully exploit the potential of brownfield sites.<br>• Mixed views were expressed by respondents on whether housing need represents an exceptional circumstance for the release of Green Belt sites.<br>• Some respondents argued for alternative spatial strategy approaches to meet housing targets, including residential development on redundant industrial sites.<br>• Some support was expressed by respondents for limited release of Green Belt sites, with those that are well used or have nature conservation value safeguarded from development.<br>• However, many respondents objected to the release of any Green Belt sites. Several respondents highlighted that many sites proposed for release in the draft Local Plan form part of the historic Enfield Chase, a rare and valuable landscape asset.<br>• There were several respondents suggesting the Green Belt sites selected for release represented unsustainable locations for development. Many respondents pointed to the tensions between the 'deeply green' vision for Enfield and proposals to develop Green Belt sites.<br>• Several respondents highlighted negative impacts resulting from the loss of Green Belt sites on the 'character and charm' of Enfield, with harmful visual and landscape impacts. |

| Theme | Summary of comments |
| --- | --- |
| | • Several respondents also highlighted the value of Green Belt sites to biodiversity, climate change mitigation, and recreation (including mental and physical health benefits). Some argued specifically that development of high-quality countryside land should be avoided.<br>• Conversely, criticism was made by some respondents for the lack of greater ambition in terms of Green Belt release. Housing affordability was cited as a justification for greater Green Belt release to deliver housing.<br>• Several respondents raised the need for a fairer distribution of new development across the borough, arguing that areas such as Crews Hill and the outer reaches of the borough should be prioritised rather than overcrowding districts like Edmonton and Ponders End. |

## Schedule A2: Summary of changes between Regulation 18 (2021) and Regulation 19 proposed submission version in March 2024

A23. The schedule below sets out the changes from regulation 18 (2021) to the regulation 19 draft ELP as of September 2023. It is noted that further minor amendments were made to policies and the supporting text after that period up until March 2024 when the plan was reconsulted on at regulation 19. As such, the schedule provides a broad overview of the changes as they evolved, but not necessarily the final changes that were put forward as part of the regulation 19 document. It should also be noted that the paragraph numbers were updated.

This schedule has been appended to the Regulation 22 Statement for information purposes only.

**Key:**

Black Text – Text remains as per the original wording from the Regulation 18 draft ELP (September 2021)
Red Text – New text added
~~Strikethrough~~ – Text removed

# Appendix B: Regulation 19 Consultation Summary

B.1. This appendix addresses the requirements of Regulation 22(1)(c)(v):

## Introduction

B.2. In preparation for the Full Council meeting the draft Local Plan was released on December 6, 2023, 13 weeks ahead of the meeting. Councillors could use this time to engage with their constituents and discuss aspirations for homes and the environment. The period between the draft Local Plan release and the Full Council meeting was not a statutory consultation but served to provide Councillors with time to review, consider, and discuss the content of the Local Plan. Minor adjustments occurred, with explanations provided in an appendix to the Officer Report for Full Council. Accompanying the draft Local Plan release, the Draft Integrated Impact Assessment (IIA) and Draft Habitats Regulation Assessment (HRA) were also published.

B.3. The Draft Local Plan Regulation 19 March 2024 was then approved for publication for a minimum 6-week period of public consultation by Full Council on 19 March 2024. The Draft Local Plan and supporting documents, including the sustainability appraisal, were published in accordance with Regulation 19 for a six week consultation period lasting from 28 March to 20 May 2024. The Council consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents in accordance with the Statement of Community Involvement and organised four consultation events to answer questions from residents and interested parties on how to respond to the consultation. The consultation documents were made available in libraries and the council Civic Centre in line with the full statement of representations procedure set out below.

B.4. This Appendix including Schedule B.1, sets out who was consulted and how that was undertaken. A total of around 5,817 respondents raised around 11,459 representations under Regulation 20. The total number of representations can be broken down as follows:

- 578 from statutory consultees
- 1,257 from landowners, developers, politicians, local and national interest groups
- 9,628 from individual residents or businesses

B.5. A summary of the main issues raised in Plan order is contained in Schedule B.3 of this Appendix. This includes the response of the Council to the comments made. The Statement of Community Involvement (SCI) indicates that the Council will consult on the Regulation 19 Local Plan for a minimum of six weeks. It commits the Council to:

- consult with statutory bodies on the scope of the Integrated Impact Assessment;
- undertake early engagement with relevant groups and organisations; and
- carry out the 'duty to co-operate' requirement.

## Who was consulted under Regulation 19 and how that was undertaken?

### Local Plan contact database

B.6. Upon publication on the Council's website, a formal notification email was sent to approximately 1,330 persons or organisations on the Council's planning policy

consultation database (which includes the statutory, specific and general consultation bodies required by the Regulations and those wishing to be notified following Regulation 18 consultation) to invite them to make representations on the Draft ELP 2019-2041. The notification email is included at Schedule B.2 below and included a link to the statement of representations procedure and to the Regulation 19 representation form (using the format recommended in the Planning Inspectorate's guidance on local plan examinations); as well as to the web-page that included the proposed submission documents and associated supporting documents (Integrated Impact Assessment and non-technical summary, HRA screening and Appropriate Assessment, evidence base, topic papers, reports on the consultation undertaken under Regulation 18 and Duty to Cooperate and Infrastructure Delivery Plan). The website also made reference to the concurrent consultation on the Transport Strategy and Place Shaping Framework. Overall the webpage generated 6,515 page views and across all evidence base and local plan documents 7,159 PDF documents were downloaded during the consultation period. Further reminder emails were also sent to the database including details of the four drop in sessions held, details of which are set out below.

### Drop in Sessions

B.7. The Council held four drop-in sessions with officers from the Local Plan Team. The Council held these events to raise awareness about the Local Plan and to help residents to understand the local plan process going forwards and how they can respond to the consultation in line with government requirements. Officers were on hand answer questions from the public, including around the Plan, evidence base documents, and the formal process of preparing the plan and the next stage of Examination in Public. Critically, the events were framed to ensure that residents understood the fact that in line with regulations, those wishing to submit a representation were required to provide a written response to the Regulation 19 consultation and that attending these events did not in itself constitute a formal representation. The location of the events was determined to provide an accessible spread for residents across Enfield.

**Table B1: Enfield Local Plan Regulation 19 public consultation events held in 2024**

| Event | Location | Date | Time |
|---|---|---|---|
| Event 1 | Community Room,<br>Edmonton Green Library<br>36-44 South Mall, Edmonton, N9 0TN | Tuesday 23 April, 2024 | 17:00-19:00 |
| Event 2 | Sports Hall,<br>Wren Academy, 3 Chace Village Road, Enfield, EN2 8GH | Thursday, 25 April, 2024 | 18:30-20:00 |
| Event 3 | Ground Floor Lobby,<br>Enfield Town Library<br>66 Church Street<br>Enfield, EN2 6AX | Tuesday, 30 April, 2024 | 12:30-14:30 |

| | | | |
|---|---|---|---|
| Event 4 | Community Room,<br>Palmers Green Library<br>Broomfield Lane<br>Palmers Green, N13 4EY | Tuesday, 30 April, 2024 | 17:00-19:00 |

### *Local Newspapers*

B.8. A notice of the local plan consultation with a web address to the local plan web page was placed in the Enfield Independent Newspaper, Parakiaki (Greek) and Avurpa (Turkish) print adverts, shown below.

**Figure B.1: Example adverts from Avrupa and Parikiaki local newspapers**

### *Enfield Council Digital Newsletters*

B.9. The draft ELP consultation was promoted extensively in the Council's suite of newsletters. These communicated key messages and ways to get involved to a range of residents and specialist stakeholders. The newsletters included News from the Council (51,000 subscribers), Housing News – sent to all Council Tenants, Leaseholders and Sheltered Accommodation Tenants with around 9,000 subscribers, and Enjoy Enfield, with around 15,000 subscribers.

### *Enfield Council Social media*

B.10. The consultation was also publicised on the Council's consultation web-page, via social media, including the dates and locations four proposed drop-in sessions.

These campaigns ran throughout the consultation period including reminders that the consultation was closing in May, and consisted of 27 separate posts across 4 channels. Over the entire consultation period from 28 March to 20 May 2024 these generated over 25,000 'impressions' or views.

***Leaflet Postal Drop***

B.11. A total of 130,000 paper leaflets promoting the Local Plan consultation were produced and distributed throughout the borough to households using a commercial distribution company. A copy of the summary leaflet can be found here and was also made available online on the council's local plan page throughout the consultation period. The leaflet also provided an easy to remember weblink (enfield.gov.uk/enfieldlocalplan) was provided. The leaflet is also included in Schedule B2 below.

***Other promotion of the Enfield Local Plan Regulation 19 Consultation***

- Electronic Notice Boards located on Council Housing Estates.
- Enfield My Life Website, School Services the Hub Website, Nextdoor Website and various bulletins produced by the Faith Forum, Community Development Team and Temporary Accommodation Team
- Posters/leaflets in Libraries and Community Hubs, Civic Centre
- Internal Staff Matters e-newsletter and intranet story
- Staff email signatures, screensavers and TV screens

Individuals and organisations had two ways to share their views:

- **By email** to: localplan@enfield.gov.uk, using the digital MS word document representation form where possible. Email representations were acknowledged and logged, and redacted versions are available on the Council's website and
- **By post** to: Strategic Planning and Design, Enfield Council, EN1 3BR. Postal responses were logged, and redacted versions are available on the Council's website.

## Main issues raised in plan order including the council's responses and actions.

B.12. A total of around 5,817 respondents raised around 11,459 comments under Regulation 20. The breakdown by type of respondent is set out in Schedule B.1 of this Appendix. Schedule B.3 of this Appendix summarises the main issues raised by the Regulation 20 representations received in response to Regulation 19 publication. This is organised by Chapter including comments on key evidence where relevant. Copies of the representations received pursuant to Regulation 19/20 are available separately here www.enfield.gov.uk/elpexamination.

## Conclusion

B.13. The campaign to raise awareness and encourage participation in the ELP consultation reached a wide and diverse audience through various channels, including staff, schools, voluntary and community groups, press and media, and direct mail. The campaign used different formats and languages to communicate the key messages and invite feedback from the public. The campaign aimed to inform, engage, and consult the residents and stakeholders of Enfield on the future development and vision of the borough. The summary above, in combination with Schedule B,1 of this Appendix, explains which bodies and persons were invited to make representations under Regulation 19 and how in accordance with the plan-making Regulations and the approach set out in the Council's Statement of

Community Involvement 2023. The section above and Schedules B.1 and B.3 of this Appendix set out the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations. The Council has therefore met the requirements of Regulation 22(1)(c) (v).

## Schedule B.1: Details of the consultation undertaken

### Table B.1.1: Those notified and respondents to the Regulation 19 consultation

<table>
<tr><th>Type of respondent</th><th>Number notified on local plan database</th><th>Number of respondents -</th><th>Respondent unique ID number and name (including agent name where relevant)</th></tr>
<tr><td>Residents/businesses - Email</td><td>1164</td><td>12,749 representations including 4,660 submitted by the Hadley Wood Neighbourhood Forum, and 2,853 submitted by the Enfield Society</td><td>See representations database for full details.</td></tr>
<tr><td>Residents/businesses - Postal</td><td>301</td><td>230</td><td>See representations database for full details.</td></tr>
<tr><td>Specified bodies under DtC and Statutory consultees</td><td>45</td><td>30</td><td><table><tr><td>Broxbourne Borough Council</td><td>580</td></tr><tr><td>Department for Education</td><td>1972</td></tr><tr><td>Environment Agency</td><td>1926</td></tr><tr><td>Greater London Authority (GLA)</td><td>120</td></tr></table></td></tr>
</table>

| Type of respondent | Number notified on local plan database | Number of respondents - | Respondent unique ID number and name (including agent name where relevant) | |
|---|---|---|---|---|
| | | | Hertfordshire County Council - Ecology | 1755 |
| | | | Hertfordshire County Council - Education and Early Years | 1755 |
| | | | Hertfordshire County Council - Highways | 1755 |
| | | | Hertfordshire County Council - Minerals and Waste planning authority | 1602 |
| | | | Hertfordshire County Council - SEND | 1755 |
| | | | Hertfordshire County Council - Strategic Transport & Rail | 1755 |
| | | | Hertfordshire County Council - Sustainability | 1755 |
| | | | Hertfordshire County Council as Lead Local Flood Authority (LLFA) | 1755 |
| | | | Hertsmere  Borough Council | 1924 |
| | | | Historic England | 1788 |
| | | | Lee Valley Regional Park Authority | 1918 |
| | | | London borough of Barnet | 2091 |
| | | | London borough of Haringey | 2029 |
| | | | London Borough of Redbridge | 1603 |
| | | | London borough of Waltham Forest | 2006 |
| | | | London Gardens Trust | 2083 |
| | | | Metropolitan Police Service Design out Crime Team | 1721 |
| | | | National Grid | 1658 |
| | | | National Highways Limited | 1753 |
| | | | Natural England | 1743 |
| | | | Network Rail | 1993 |

| Type of respondent | Number notified on local plan database | Number of respondents - | Respondent unique ID number and name (including agent name where relevant) | |
|---|---|---|---|---|
| | | | NHS London Healthy Urban Development Unit | 1872 |
| | | | North Middlesex University Hospital NHS Trust | 1868 |
| | | | Sport England | 1967 |
| | | | Transport for London | 1891 |
| | | | Welwyn Hatfield Borough Council | 1920 |
| Local interest groups | 12 by email / 3 by mail | 28 | Barnet and Enfield Swifts Group | 1785 |
| | | | Better Homes Enfield | 1708 |
| | | | Bush Hill Park Residents Association | 4218 |
| | | | Campaign to Protect Real Ale | 2054 |
| | | | Edmonton and Winchmore Hill Conservative Association | 01784 |
| | | | Edmonton Hundred Historical Society (EHHS) | 4036 |
| | | | Enfield and Barnet branch of CAMRA | 2086 |
| | | | Enfield Archaeological Society | 0002 |
| | | | Enfield Climate Action Forum - Air Pollution Working Group (EnCaf - APWG) | 2043 |
| | | | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) | 1676 |
| | | | Enfield Over 50s Forum | 1765 |
| | | | Enfield Road Watch | 1687 |
| | | | Enfield Society | 1794 |
| | | | Enfield Town Residents Association | 2030 |
| | | | Federation of Enfield Residents & Allied Associations | 3273 |
| | | | Forty Hill and Bulls Cross Study Group | 1879 |

<table>
<tr><th>Type of respondent</th><th>Number notified on local plan database</th><th>Number of respondents -</th><th>Respondent unique ID number and name (including agent name where relevant)</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>Fox Lane District Residents' Association</td><td>6825</td></tr>
<tr><td>Friends of Trent Country Park and Trent Park Conservation Committee</td><td>3448</td></tr>
<tr><td>Friends of Whitewebbs Park</td><td>1805</td></tr>
<tr><td>Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum</td><td>1311</td></tr>
<tr><td>Hadley Wood Neighbourhood Planning Forum</td><td>1669</td></tr>
<tr><td>Lakes Estate Conservation Area Study Group</td><td>1813</td></tr>
<tr><td>Lea Valley Growers Association</td><td>1910</td></tr>
<tr><td>London Green Belt Council</td><td>06845</td></tr>
<tr><td>NW London RSPB</td><td>1700</td></tr>
<tr><td>Swifts Local Network: Swifts & Planning Group</td><td>1883</td></tr>
<tr><td>The Barnet Society</td><td>1817</td></tr>
<tr><td>Friends of Enfield Chase</td><td>1759</td></tr>
</table>
</td></tr>
<tr><td>National interest groups</td><td>8</td><td>8</td><td>
<table>
<tr><td>Canal & River Trust</td><td>2007</td></tr>
<tr><td>CPRE London</td><td>1726</td></tr>
<tr><td>CPRE London</td><td>1944</td></tr>
<tr><td>Herts & Middlesex Wildlife Trust</td><td>1852</td></tr>
<tr><td>Home Builders Federation</td><td>1851</td></tr>
<tr><td>London Wildlife Trust</td><td>1974</td></tr>
<tr><td>National Park City Foundation</td><td>2014</td></tr>
<tr><td>Theatres Trust</td><td>1889</td></tr>
</table>
</td></tr>
</table>

| Type of respondent | Number notified on local plan database | Number of respondents - | Respondent unique ID number and name (including agent name where relevant) | |
|---|---|---|---|---|
| | | | UK Innovation Corridor | 1888 |
| Politicians | 63 councillors + 3 MPs | 16 | Cllr O'Halloran | 1762 |
| | | | Cllr Fallart | 1670 |
| | | | Cllr Fallart | 1779 |
| | | | Cllr Milne | 1890 |
| | | | Cllr Supple | 2003 |
| | | | Edmonton and Winchmore Hill Conservative Association | 1784 |
| | | | Enfield's Conservative Group | 1670 |
| | | | Joanne McCartney AM<br>London Assembly Member for Enfield and Haringey | 1896 |
| | | | The Green Party | 1147 |
| | | | Cllr Rye | 1670 |
| | | | Cllr Thorp | 1670 |
| | | | Cllr Skelton | 1670 |
| | | | Cllr Ioannou | 1670 |
| | | | Cllr Smith | 1670 |
| | | | Cllr Laban | 1670 |
| | | | Cllr Chamberlain | 1670 |
| | | | Cllr Morreale | 1670 |
| | | | Cllr Morreale | 1836 |

| Type of respondent | Number notified on local plan database | Number of respondents - | Respondent unique ID number and name (including agent name where relevant) | |
|---|---|---|---|---|
| Landowners, developers and agents | 41 | 62 | LBE Strategic Property | 1946 |
| | | | Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). | 1682 |
| | | | ARGO Real Estate Limited | 1733 |
| | | | Asda Stores Ltd | 1732 |
| | | | Berkeley Homes (North East London) Ltd | 1916 |
| | | | BL Logistics Investment Limited (British Land) | 2011 |
| | | | Blackrock UK Property Fund | 1952 |
| | | | Builder Depot Group | 1940 |
| | | | Capel Manor College | 1885 |
| | | | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane | 1895 |
| | | | Comer Homes Group | 1929 |
| | | | Crews Hill Golf Club | 1738 |
| | | | D&J London Property Ltd | 1703 |
| | | | Danescroft (FRELD Claverings) LLP | 1747 |
| | | | Diocese of London | 1744 |
| | | | Duchy of Lancaster | 1672 |
| | | | Forty Leisure Limited and Jubilee Church | 1876 |
| | | | Fairview New Homes | 1746 |
| | | | Geras Estates Limited and Hebe Developments Limited | 1915 |
| | | | Gfplanning Limited. | 0014 |
| | | | Goodman UK Limited | 1874 |

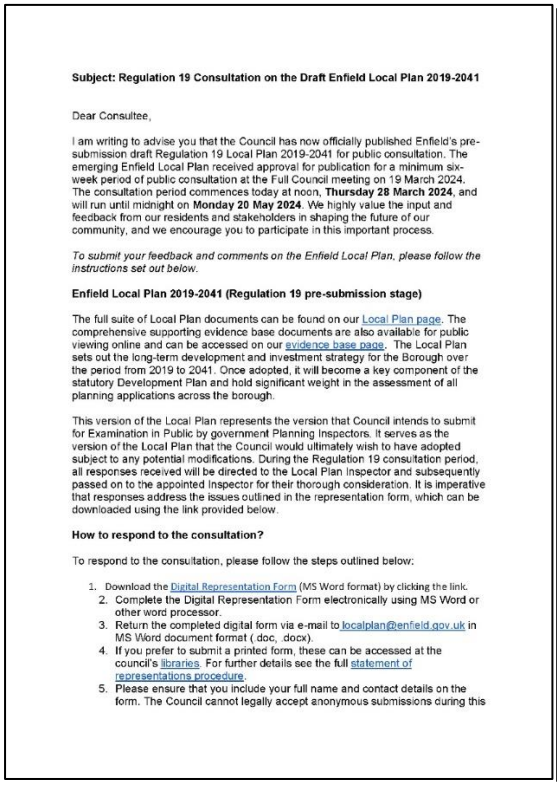
| Type of respondent | Number notified on local plan database | Number of respondents - | Respondent unique ID number and name (including agent name where relevant) | |
|---|---|---|---|---|
| | | | Henry Boot Developments (HBD) | 1943 |
| | | | Holmes & Hills LLP | 0012 |
| | | | Ikea Properties Investments Ltd | 1921 |
| | | | Joseph Homes Regeneration Limited | 1875 |
| | | | Landsdown | 1998 |
| | | | Landvest Crews Hill Ltd | 1894 |
| | | | Landvest Developments Limited | 1873 |
| | | | Lansdown | 1998 |
| | | | LBE Strategic Property | 1946 |
| | | | LBE Strategic Property | 1960 |
| | | | Lee Valley Regional Park Authority | 1918 |
| | | | Leonard F Jollye (Brookmans Park) | 1925 |
| | | | London Diocesan Fund | 1913 |
| | | | McCarthy & Stone Retirement Lifestyles Ltd | 1867 |
| | | | McDonald's Restaurants Ltd | 1917 |
| | | | Meridian Water (LBE) | 1945 |
| | | | New Ladderswood LLP | 2090 |
| | | | NHS Property Services | 1985 |
| | | | Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2 | 1927 |
| | | | on behalf of Tottenham Hotspur Football Co Ltd | 1861 |
| | | | on behalf of Tottenham Hotspur Football Co Ltd | 1930 |
| | | | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' | 1881 |

| Type of respondent | Number notified on local plan database | Number of respondents - | Respondent unique ID number and name (including agent name where relevant) | |
|---|---|---|---|---|
| | | | Prologis for Ravenside Retail Park | 1905 |
| | | | Regenta Development | 1984 |
| | | | Rockwell London Ltd for Kings Oak | 1932 |
| | | | Royal London Mutual Insurance Society Limited for Southbury Leisure Park | 1749 |
| | | | SEGRO | 1922 |
| | | | Taylor Wimpey | 1919 |
| | | | Telereal Securitised Properties GP Limited | 1728 |
| | | | TfL Places for London | 1937 |
| | | | Thames Water | 1681 |
| | | | The Glasgow Stud | 1869 |
| | | | The Wave | 1880 |
| | | | Thompsons Garden Centre | 5244 |
| | | | Thompsons of Crews Hill Ltd | 1750 |
| | | | Tile Kiln Farm | 2001 |
| | | | Tottenham Hotspur Football Co Ltd | 2089 |
| | | | Trent Park Golf Club | 1741 |
| | | | Vistry Group | 1897 |
| | | | Warmerdam & Co (Crews Hill) Ltd | 1730 |
| | | | Winners Property Company Limited | 1764 |
| | | | Wolden Garden Centre Ltd | 1887 |
| | | | Diocese of London | 1746 |

| Type of respondent | Number notified on local plan database | Number of respondents - | Respondent unique ID number and name (including agent name where relevant) |
|---|---|---|---|
| TOTAL | 1,632 | 144 plus 12,979 representation submitted by residents | |

## Schedule B.2: Regulation 19 notification materials

### 1. Notification email sent to local plan database (approximately 1,330 contacts)



**Subject: Regulation 19 Consultation on the Draft Enfield Local Plan 2019-2041**

Dear Consultee,

I am writing to advise you that the Council has now officially published Enfield's pre-submission draft Regulation 19 Local Plan 2019-2041 for public consultation. The emerging Enfield Local Plan received approval for publication for a minimum six-week period of public consultation at the Full Council meeting on 19 March 2024. The consultation period commences today at noon, **Thursday 28 March 2024**, and will run until midnight on **Monday 20 May 2024**. We highly value the input and feedback from our residents and stakeholders in shaping the future of our community, and we encourage you to participate in this important process.

*To submit your feedback and comments on the Enfield Local Plan, please follow the instructions set out below.*

**Enfield Local Plan 2019-2041 (Regulation 19 pre-submission stage)**

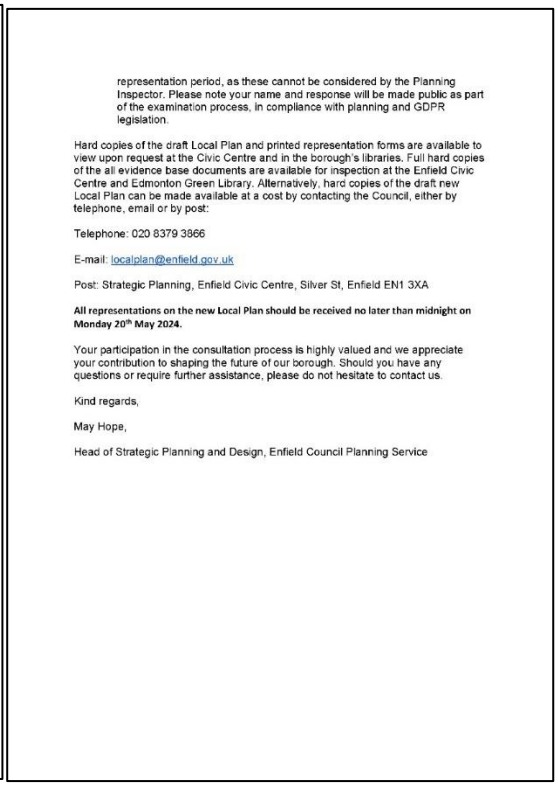
The full suite of Local Plan documents can be found on our Local Plan page. The comprehensive supporting evidence base documents are also available for public viewing online and can be accessed on our evidence base page. The Local Plan sets out the long-term development and investment strategy for the Borough over the period from 2019 to 2041. Once adopted, it will become a key component of the statutory Development Plan and hold significant weight in the assessment of all planning applications across the borough.

This version of the Local Plan represents the version that Council intends to submit for Examination in Public by government Planning Inspectors. It serves as the version of the Local Plan that the Council would ultimately wish to have adopted subject to any potential modifications. During the Regulation 19 consultation period, all responses received will be directed to the Local Plan Inspector and subsequently passed on to the appointed Inspector for their thorough consideration. It is imperative that responses address the issues outlined in the representation form, which can be downloaded using the link provided below.

**How to respond to the consultation?**

To respond to the consultation, please follow the steps outlined below:

1. Download the Digital Representation Form (MS Word format) by clicking the link.
2. Complete the Digital Representation Form electronically using MS Word or other word processor.
3. Return the completed digital form via e-mail to localplan@enfield.gov.uk in MS Word document format ( doc, .docx).
4. If you prefer to submit a printed form, these can be accessed at the council's libraries. For further details see the full statement of representations procedure.
5. Please ensure that you include your full name and contact details on the form. The Council cannot legally accept anonymous submissions during this



representation period, as these cannot be considered by the Planning Inspector. Please note your name and response will be made public as part of the examination process, in compliance with planning and GDPR legislation.

Hard copies of the draft Local Plan and printed representation forms are available to view upon request at the Civic Centre and in the borough's libraries. Full hard copies of the all evidence base documents are available for inspection at the Enfield Civic Centre and Edmonton Green Library. Alternatively, hard copies of the draft new Local Plan can be made available at a cost by contacting the Council, either by telephone, email or by post:

Telephone: 020 8379 3866

E-mail: localplan@enfield.gov.uk

Post: Strategic Planning, Enfield Civic Centre, Silver St, Enfield EN1 3XA

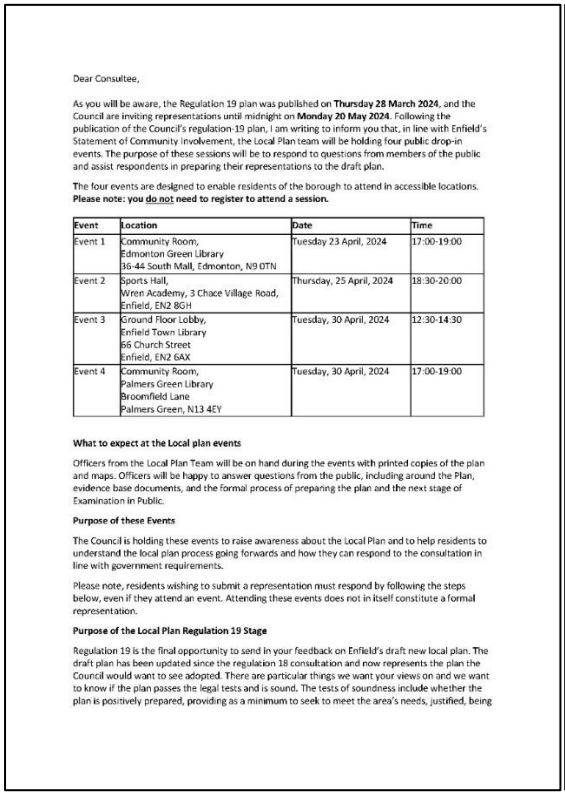
**All representations on the new Local Plan should be received no later than midnight on Monday 20th May 2024.**

Your participation in the consultation process is highly valued and we appreciate your contribution to shaping the future of our borough. Should you have any questions or require further assistance, please do not hesitate to contact us.

Kind regards,

May Hope,

Head of Strategic Planning and Design, Enfield Council Planning Service



Dear Consultee,

As you will be aware, the Regulation 19 plan was published on **Thursday 28 March 2024**, and the Council are inviting representations until midnight on **Monday 20 May 2024**. Following the publication of the Council's regulation 19 plan, I am writing to inform you that, in line with Enfield's Statement of Community Involvement, the Local Plan team will be holding four public drop-in events. The purpose of these sessions will be to respond to questions from members of the public and assist respondents in preparing their representations to the draft plan.

The four events are designed to enable residents of the borough to attend in accessible locations. **Please note: you do not need to register to attend a session.**

| Event | Location | Date | Time |
|---|---|---|---|
| Event 1 | Community Room,<br>Edmonton Green Library<br>36-44 South Mall, Edmonton, N9 0TN | Tuesday 23 April, 2024 | 17:00-19:00 |
| Event 2 | Sports Hall,<br>Wren Academy, 3 Chace Village Road,<br>Enfield, EN2 8GH | Thursday, 25 April, 2024 | 18:30-20:00 |
| Event 3 | Ground Floor Lobby,<br>Enfield Town Library<br>66 Church Street<br>Enfield, EN2 6AX | Tuesday, 30 April, 2024 | 12:30-14:30 |
| Event 4 | Community Room,<br>Palmers Green Library<br>Broomfield Lane<br>Palmers Green, N13 4EY | Tuesday, 30 April, 2024 | 17:00-19:00 |

**What to expect at the Local plan events**

Officers from the Local Plan Team will be on hand during the events with printed copies of the plan and maps. Officers will be happy to answer questions from the public, including around the Plan, evidence base documents, and the formal process of preparing the plan and the next stage of Examination in Public.

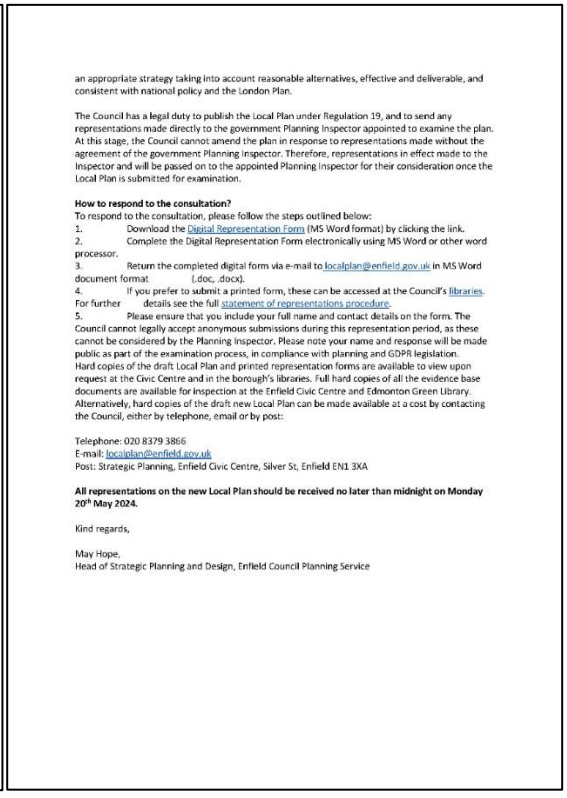
**Purpose of these Events**

The Council is holding these events to raise awareness about the Local Plan and to help residents to understand the local plan process going forwards and how they can respond to the consultation in line with government requirements.

Please note, residents wishing to submit a representation must respond by following the steps below, even if they attend an event. Attending these events does not in itself constitute a formal representation.

**Purpose of the Local Plan Regulation 19 Stage**

Regulation 19 is the final opportunity to send in your feedback on Enfield's draft new local plan. The draft plan has been updated since the regulation 18 consultation and now represents the plan the Council would want to see adopted. There are particular things we want your views on and we want to know if the plan passes the legal tests and is sound. The tests of soundness include whether the plan is positively prepared, providing as a minimum to seek to meet the area's needs, justified, being



an appropriate strategy taking into account reasonable alternatives, effective and deliverable, and consistent with national policy and the London Plan.

The Council has a legal duty to publish the Local Plan under Regulation 19, and to send any representations made directly to the government Planning Inspector appointed to examine the plan. At this stage, the Council cannot amend the plan in response to representations made without the agreement of the government Planning Inspector. Therefore, representations in effect made to the Inspector and will be passed on to the appointed Planning Inspector for their consideration once the Local Plan is submitted for examination.

**How to respond to the consultation?**

To respond to the consultation, please follow the steps outlined below:

1. Download the Digital Representation Form (MS Word format) by clicking the link.
2. Complete the Digital Representation Form electronically using MS Word or other word processor.
3. Return the completed digital form via e-mail to localplan@enfield.gov.uk in MS Word document format (.doc, .docx).
4. If you prefer to submit a printed form, these can be accessed at the Council's libraries. For further details see the full statement of representations procedure.
5. Please ensure that you include your full name and contact details on the form. The Council cannot legally accept anonymous submissions during this representation period, as these cannot be considered by the Planning Inspector. Please note your name and response will be made public as part of the examination process, in compliance with planning and GDPR legislation.

Hard copies of the draft Local Plan and printed representation forms are available to view upon request at the Civic Centre and in the borough's libraries. Full hard copies of all the evidence base documents are available for inspection at the Enfield Civic Centre and Edmonton Green Library. Alternatively, hard copies of the draft new Local Plan can be made available at a cost by contacting the Council, either by telephone, email or by post:

Telephone: 020 8379 3866
E-mail: localplan@enfield.gov.uk
Post: Strategic Planning, Enfield Civic Centre, Silver St, Enfield EN1 3XA

**All representations on the new Local Plan should be received no later than midnight on Monday 20th May 2024.**

Kind regards,

May Hope,
Head of Strategic Planning and Design, Enfield Council Planning Service

# 2. Statement of representations procedure available online

## Regulation 19 Statement of Representations Procedure

**1. Statement of Representation**

1.1. This statement has been prepared by the London Borough of Enfield [the Council] pursuant to the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19, 20, 21 and 35), as amended.

**2. Title of Document(s)**

- Enfield Local Plan – Regulation 19 pre-submission version March 2024.
- Proposed Policies Map
- ELP Regulation 19 Integrated Impact Assessment and Appendices December 2023 and Non-Technical Summary Document 2023
- ELP Regulation 19 Habitats Regulations Assessment December 2023.

**3. Subject Matter**

3.1. The Local Plan sets out the long-term development and investment strategy for the Borough over the period from 2019 to 2041. It forms part of the statutory Development Plan and is one of the council's most important documents. It is used to assess all planning applications across the borough. The Local Plan makes provision for new housing, giving priority to affordable and family housing, employment space and other development needs including infrastructure to support growth and regeneration in an inclusive and sustainable way. The ELP 2041 publication document is the full version of the Local Plan, which takes into account the feedback received during the previous stages of consultation, and also takes into account the most recent evidence base updates.

3.2. The publication version of the ELP 2041 represents the version of the Local Plan that Council intends to submit for examination and is the version of the Local Plan that the Council would ultimately wish to have adopted (subject to any potential modifications recommended by the Planning Inspector (or Inspectors) presiding over the Local Plan examination). All responses received during the Regulation 19 consultation are in effect made to the Inspector and will be passed on to the appointed Planning Inspector for their consideration once the Local Plan is submitted for examination.

3.3. The ELP 2041 is a single (all in one) Local Plan (other than in respect of Gypsy, Roma and Traveller needs) that contains the spatial strategy, strategic policies, area-based policies, detailed development management policies and site allocations to guide how the Borough will change and develop over the plan period up to 2041. Upon adoption, the ELP 2041 will replace all of the current Development Plan Documents listed in paragraph 2 above.

3.4. The documents (listed in section 2. above) are being made available for public inspection to provide any individual, group, or business the opportunity to make representations on the 'soundness' and legal compliance, including the duty to co-operate of the Enfield Local Plan – Regulation 19 pre-submission version March 2024, for the consideration of an independent Planning Inspector. This Statement of Representations Procedure will also be available for inspection.

**4. Period for submission of representations**

4.1. The period for submission of representations will take place from 28 March to 20 May 2024.

**5. How and where to view the Enfield Local Plan – Regulation 19 pre-submission version March 2024 (Statement of Fact)**

5.1. The Enfield Local Plan – Regulation 19 pre-submission version March 2024 and all supporting documents including the Statement of Representations Procedure can be downloaded and inspected online by visiting: https://www.enfield.gov.uk/newlocalplan (External link).

5.2. You can inspect physical copies of the documents (listed in section 2. above), the Consultation Statement and appendices and the Statement of Representations Procedure at the following locations as well as at all Community Libraries:

- Enfield Civic Centre, Silver St, Enfield EN1 3XA (Full evidence
- Enfield Town Library, 66 Church Street, Enfield EN2 6AX
- Edmonton Green Library, 36-44 South Mall, Edmonton N9 0TN
- Ordnance Unity Centre Library, 645 Hertford road Enfield, EN3 6ND
- Palmers Green Library, Broomfield Lane, Palmers Green, N13 4EY

*Please check the opening times here: https://new.enfield.gov.uk/services/libraries/contact-information-and-opening-hours/(External link)*

**Full hard copies of all evidence base documents are available for inspection at the Civic Centre and Edmonton Green Library only.**

Or, if you are having trouble accessing the documents, email us at localplan@enfield.gov.uk (External link).

**6. What to consider when making a representation**

6.1. When making representations on the documents (listed in section 2. above), the following questions should be considered:

- **Is the plan legally compliant?** - Does the plan comply with the relevant legislation and regulations in the way it has been prepared, and in its content?
- **Is the plan 'sound'?** - Has the plan been 'positively prepared'? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? Is it consistent with the latest regional and national planning policy?
- **Does the plan comply with the 'Duty to Cooperate'?** - Has the local planning authority engaged constructively, actively and on an ongoing basis with neighbouring authorities and other prescribed bodies during the preparation of the plan?

**7. How to make a representation**

7.1. Submissions for the Regulation 19 representation period are required to be made to the Council between 28 March and 20 May 2024. Your comments must be received by **midnight on Monday 20 May 2024**.

7.2. Please note that you must include your full name and contact details. The Council cannot legally accept anonymous submissions during this representation period as these cannot be considered by the Planning Inspector. Please note that your name and response will be made public as part of the examination process and that this is required by legislation and therefore complies with GDPR legislation. Submissions should be made in writing via the following methods.

7.3. Methods of submission:

- Completing the Digital Representation Form – A completed representation form can be returned via e-mail to localplan@enfield.gov.uk in MS Word document format. Representation forms are available for download at:

  https://www.enfield.gov.uk/newlocalplan (External link).
- Physical copies of the representation form will be available at locations where the documents are available for inspection (listed in paragraphs 5.2 above) and can be posted to Strategic Planning, Enfield Civic Centre, Silver St, Enfield EN1 3XA. Alternatively, hard copies of the Local Plan can be made available at a cost by contacting the Strategic Planning and Design team by telephone on 020 8379 3866 or via email or by post (see above).

7.4. All representations must set out clearly why, and how, it is considered that the Enfield Local Plan – Regulation 19 pre-submission version March 2024 (in whole or in part) is: legally compliant or non-compliant; compliant or non-compliant with the Duty to Cooperate; and/or, sound or unsound.

7.5. Please note that all submissions will be required to be made public along with the name of the person making the submission, all other personal information will be kept confidential. All submissions will then be submitted to the Secretary of State for Levelling Up, Housing and Communities and the Planning Inspectorate, alongside the Enfield Local Plan – Regulation 19 pre-submission version March 2024 and all other supporting documents after this period of representation.

7.6. Enfield Council Privacy Notice: https://www.enfield.gov.uk/services/planning/new-enfield-local-plan#privacy-notice-for-the-enfield-local-plan

**8. Notification of next stages of the Enfield Local Plan**

8.1 When making your representation you will also have the option to request to be notified of the following stages of the Local Plan process:

- the submission of the Local Plan for independent Examination,
- the publication of the Inspector's recommendations following independent Examination of the Local Plan, and
- the adoption of the Local Plan.

8.2 Once the Regulation 19 representation period has closed, updates regarding the status of the Local Plan will be published on the Council's Planning Policy webpages. Any person who makes a submission during the Regulation 19 representation period will automatically be added to the strategic planning team's database and will be provided with updates on the progress of the Local Plan including when we submit our Local Plan for independent Examination, when the Planning Inspector's recommendations are published and when the Local Plan is adopted. If you wish to be removed from this database, please contact localplan@enfield.gov.uk

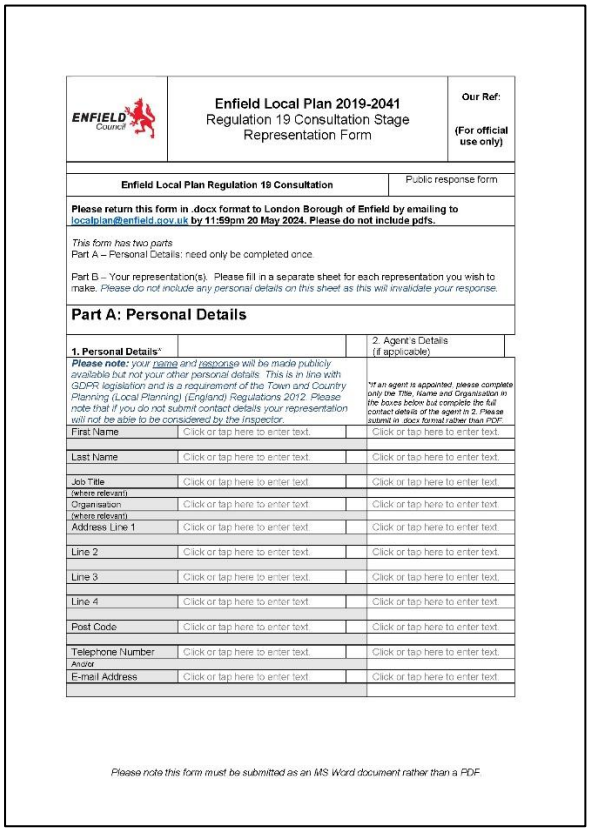
8.3 An independent Planning Inspector will then be appointed by the Secretary of State of Levelling Up, Housing and Communities to undertake an independent Examination into whether the Local Plan is legally compliant, meets the duty to cooperate, and passes the tests of soundness. The Examination will include hearing sessions held by the Planning Inspector in public at which those who have made a valid representation have the right to speak. If you wish to speak, please make this clear in your representation.

**9 Contact the Local Plan Team**

9.1 If you would like any further information on the Enfield Local Plan – Regulation 19 pre-submission version March 2024, or any of the supporting documents please contact us via:

- Telephone: 020 8379 3866
- E-mail: localplan@enfield.gov.uk
- Post: Strategic Planning, Enfield Civic Centre, Silver St, Enfield EN1 3XA

## 3. PDF of representation form provided online and via post



ENFIELD Council

**Enfield Local Plan 2019-2041**
Regulation 19 Consultation Stage
Representation Form

**Our Ref:**

**(For official use only)**

| **Enfield Local Plan Regulation 19 Consultation** | Public response form |
|---|---|

**Please return this form in .docx format to London Borough of Enfield by emailing to localplan@enfield.gov.uk by 11:59pm 20 May 2024. Please do not include pdfs.**

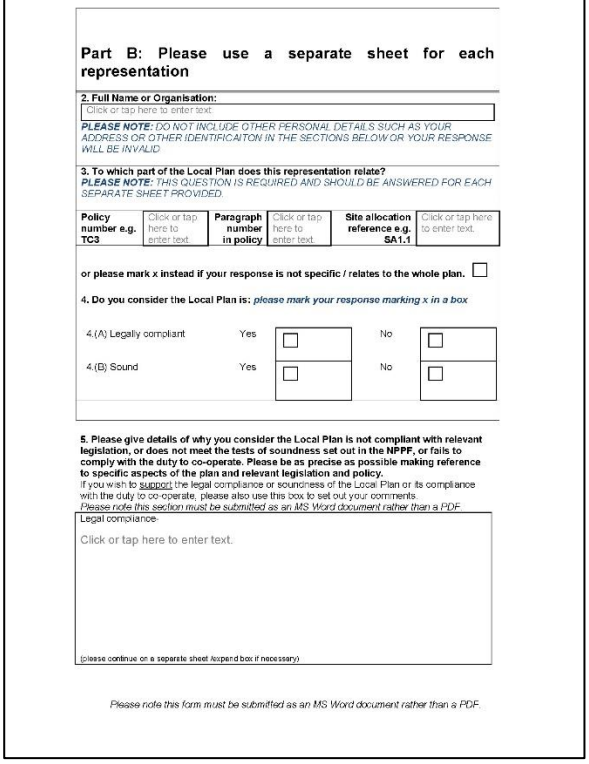
*This form has two parts*
Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. *Please do not include any personal details on this sheet as this will invalidate your response.*

## Part A: Personal Details

| **1. Personal Details*** | | 2. Agent's Details (if applicable) | |
|---|---|---|---|
| ***Please note:** your name and response will be made publicly available but not your other personal details. This is in line with GDPR legislation and is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. Please note that if you do not submit contact details your representation will not be able to be considered by the Inspector.* | | **If an agent is appointed, please complete only the Title, Name and Organisation in the boxes below but complete the full contact details of the agent in 2. Please submit in .docx format rather than PDF.* | |
| First Name | Click or tap here to enter text. | | Click or tap here to enter text. |
| Last Name | Click or tap here to enter text. | | Click or tap here to enter text. |
| Job Title (where relevant) | Click or tap here to enter text. | | Click or tap here to enter text. |
| Organisation (where relevant) | Click or tap here to enter text. | | Click or tap here to enter text. |
| Address Line 1 | Click or tap here to enter text. | | Click or tap here to enter text. |
| Line 2 | Click or tap here to enter text. | | Click or tap here to enter text. |
| Line 3 | Click or tap here to enter text. | | Click or tap here to enter text. |
| Line 4 | Click or tap here to enter text. | | Click or tap here to enter text. |
| Post Code | Click or tap here to enter text. | | Click or tap here to enter text. |
| Telephone Number And/or | Click or tap here to enter text. | | Click or tap here to enter text. |
| E-mail Address | Click or tap here to enter text. | | Click or tap here to enter text. |

*Please note this form must be submitted as an MS Word document rather than a PDF.*



## Part B: Please use a separate sheet for each representation

**2. Full Name or Organisation:**
Click or tap here to enter text.

***PLEASE NOTE:** DO NOT INCLUDE OTHER PERSONAL DETAILS SUCH AS YOUR ADDRESS OR OTHER IDENTIFICAITON IN THE SECTIONS BELOW OR YOUR RESPONSE WILL BE INVALID*

**3. To which part of the Local Plan does this representation relate?**
***PLEASE NOTE:** THIS QUESTION IS REQUIRED AND SHOULD BE ANSWERED FOR EACH SEPARATE SHEET PROVIDED.*

| **Policy number e.g. TC3** | Click or tap here to enter text. | **Paragraph number in policy** | Click or tap here to enter text. | **Site allocation reference e.g. SA1.1** | Click or tap here to enter text. |
|---|---|---|---|---|---|

**or please mark x instead if your response is not specific / relates to the whole plan.** ☐

**4. Do you consider the Local Plan is:** ***please mark your response marking x in a box***

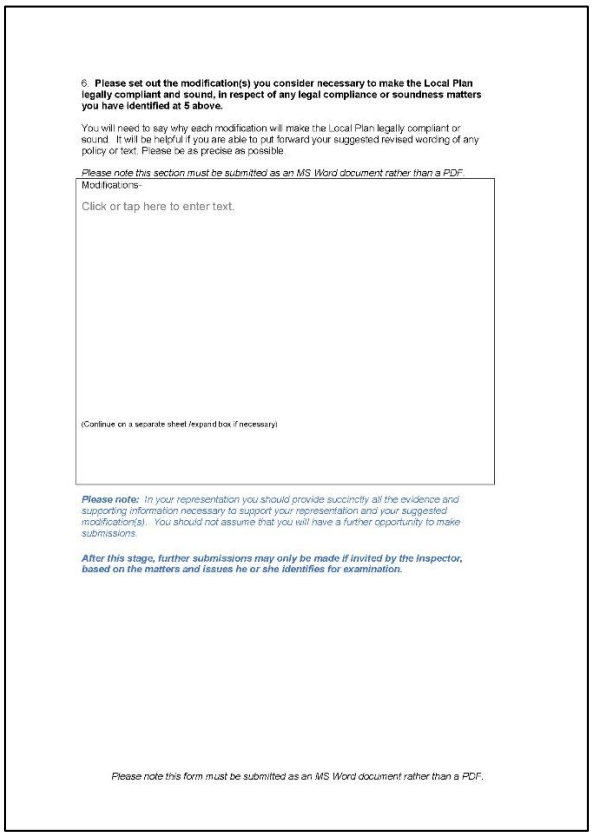
| | | | | |
|---|---|---|---|---|
| 4.(A) Legally compliant | Yes | ☐ | No | ☐ |
| 4.(B) Sound | Yes | ☐ | No | ☐ |

**5. Please give details of why you consider the Local Plan is not compliant with relevant legislation, or does not meet the tests of soundness set out in the NPPF, or fails to comply with the duty to co-operate. Please be as precise as possible making reference to specific aspects of the plan and relevant legislation and policy.**
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.
*Please note this section must be submitted as an MS Word document rather than a PDF.*

Legal compliance-
Click or tap here to enter text.

(please continue on a separate sheet /expand box if necessary)

*Please note this form must be submitted as an MS Word document rather than a PDF.*



6. **Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.**

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*Please note this section must be submitted as an MS Word document rather than a PDF.*

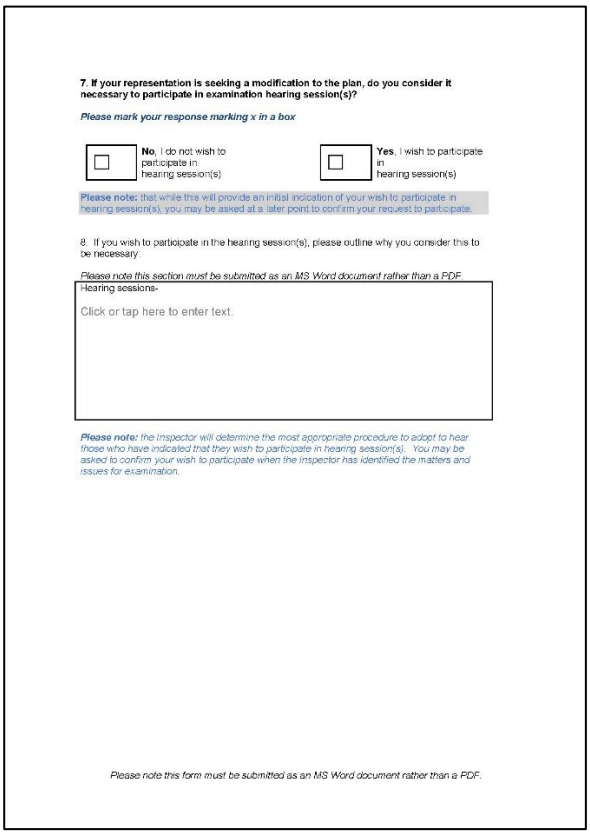
Modifications-
Click or tap here to enter text.

(Continue on a separate sheet /expand box if necessary)

***Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.***

*Please note this form must be submitted as an MS Word document rather than a PDF.*



**7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

***Please mark your response marking x in a box***

☐ **No**, I do not wish to participate in hearing session(s)

☐ **Yes**, I wish to participate in hearing session(s)

**Please note:** that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

*Please note this section must be submitted as an MS Word document rather than a PDF.*

Hearing sessions-
Click or tap here to enter text.

***Please note:** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

*Please note this form must be submitted as an MS Word document rather than a PDF.*

## 4. Letter/explanatory note for library staff

Dear Library Staff,

I hope this memo finds you well. We would like to inform you about the upcoming developments regarding the Enfield Local Plan, a crucial document outlining the Borough's vision and spatial strategy through 2041. As the library plays a pivotal role in disseminating information to the community, it is essential for staff members to be aware of the key points outlined below.

Overview:

The Enfield Local Plan is in the process of being developed to allocate sites for housing, employment, and other development needs. It addresses critical issues such as climate change, good design, infrastructure delivery, and the protection of our built and natural environments.

Key Dates

On 19 March 2024, Full Council approved the draft Local Plan for a formal statutory six-week public consultation, as required by law. All responses received during this period will be submitted to the Secretary of State for an independent examination.

The draft Local Plan will now be published for statutory consultation under Regulation 19 commencing on Thursday 28 March 2024 for a minimum six-week period ending on Monday 20 May 2024. Interested parties can respond using the Digital Representation Form or via a printed form, and all feedback will be submitted alongside the draft Local Plan to the Secretary of State.

Accompanying the draft Local Plan release, the Integrated Impact Assessment (IIA) and information for Habitats Regulation Assessment (HRA) are made available to the libraries. These resources aim to help Councillors understand the choices made during the planning process, considering social, environmental, and economic impacts.

Hard copies of the Local Plan, the IIA and HRA and printed forms are available in the library and can be viewed online at https://www.enfield.gov.uk/services/planning/new-enfield-local-plan

The full suite of Local Plan documents, including the comprehensive supporting evidence base is available for public viewing. You can access these documents in their entirety by following the link provided at: www.enfield.gov.uk/newlocalplan

It is crucial for library staff to be informed about the Enfield Local Plan and its upcoming milestones, as our patrons may seek information and resources related to this important community development initiative. We appreciate your attention to this matter.

For any further updates on the consultation process, please stay tuned for additional information at the appropriate time.

Yours faithfully

May Hope

**May Hope**

Head of Strategic Planning & Design | Planning Service

**Team number**: 020 8379 3866

# 5. Screenshots of Enfield Local Plan webpages on 20.05.2024

Newsletter Login/Register Accessibility tools

ENFIELD Council

Search this site for information, advice and more...

All services

Home > Services > Planning and building > New Enfield Local Plan

## New Enfield Local Plan

- New Enfield Local Plan - Regulation 19 consultation
- Local Plan preferred approaches consultation 2021
- Local Plan issues and options consultation 2018
- Privacy notice for the Enfield Local Plan

### New Enfield Local Plan - Regulation 19 consultation

**Thursday 28 March to Monday 20 May 2024**

The emerging Enfield Local Plan was approved for publication for a minimum 6-week period of public consultation by Full Council on 19 March 2024. To review the details of the Full Council meeting and access the minutes, see the agenda for the Full Council meeting.

**The consultation period commenced on Thursday 28 March and will conclude on Monday 20 May 2024**. Please see the Local Plan Regulation 19 pre-submission version consultation documents below, and for how to respond.

The council has prepared a summary leaflet of the local plan (PDF, 7109.38 KB).

#### Enfield Regulation 19 Local Plan documents for consultation

Minor editorial changes have been made to the pre-publication version that was released in December 2023. These modifications are outlined in the Minor amendments table (PDF, 551.27 KB).

**Local plan and appendices, and policy map:**

- ELP REG19 Consult Chapters 1-2 (PDF, 14839.61 KB)
- ELP REG19 Consult Chapters 3-15 (PDF, 18754.5 KB)
- ELP REG19 Appendices A Evidence Base and B KPIs (PDF, 249.24 KB)
- ELP REG19 Appendix C Site Allocations (PDF, 12566.69 KB)
- ELP REG19 Appendix D Tall Buildings Maps (PDF, 12648.34 KB)
- ELP REG19 Appendix E Developer Contributions (PDF, 156.47 KB)
- ELP Policies-Map A0 Rev-A (PDF, 18702.97 KB)

**Statutory assessments**

- ELP REG19 IIA and appendices (PDF, 11902.53 KB)
- ELP REG19 IIA Non-Technical Summary (PDF, 525.85 KB)
- ELP REG19 HRA Reg 19 (PDF, 7263.5 KB)
- ELP Reg19 EQIA (PDF, 258.2 KB)

**Supporting evidence base documents**

You can view all of the supporting documents which form part of the evidence base used in the preparation of the ELP.

#### Responding to the consultation

Please download and complete a copy of the Digital representation form (DOCX, 51.89 KB).

Please return the form via email to localplan@enfield.gov.uk in MS Word document format by **midnight on Monday 20 May 2024**.

**Please note** - you must include your full name and contact details. The council cannot legally accept anonymous submissions during this representation period as these cannot then be considered by the Planning Inspector.

and Equalities Impact Assessment are available to view above.

**How will people find out about the plan?**

The council's webpages and social media platforms will be used to make sure people know about the consultation.

There will be a press release and public notice in the local newspaper in the first week of the representation period. Social media messages using Twitter and Facebook will also be used to publicise the representation period when it starts and throughout the 6 weeks to encourage people to make their representations online.

Everyone registered on the Local Plan database will be informed of the representation period by email or letter. This includes specific consultees, residents and key stakeholders. This is in line with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Enfield's SCI. The letter will include a brief overview of the representation period, where to get the information from and how to make representations. There will be a dedicated representation webpage that will provide all the information needed to make a representation. Residents will also be contacted through mailshots where they are signed up to receive updates from the council.

**How do I make a representation?**

At the regulation 19 stage, there is a formal method of responding that is required by the Planning Inspectorate. Only comments on the soundness and legal compliance of the plan can be made and it must be targeted to a specific policy or paragraph in the draft Plan.

A representation form in MS Word format allows people to refer to a policy, policies map reference, diagram, paragraph or supporting document (for example, the Sustainable Appraisal and/or Habitats Regulation Assessment) and then to explain why they think it is or is not legally compliant or/and sound. It will also include a question asking people to set out the modifications that they consider necessary to make the pre-submission Local Plan legally compliant and/or sound including any revised wording. Respondents will have the ability to attach supporting documents to their justification if relevant.

The respondent will also be asked whether they wish to participate at the oral examination if they are seeking a modification and to explain why. It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

The response form will also ask whether the respondent wishes to be kept informed of the submission, publication and adoption stage of the local plan process. A guidance note will be made available so that people understand how they can respond.

We encourage the use of electronic documents and ask people to submit their representations electronically using MS Word format. If respondents cannot get access to a computer, then we can help them find an alternative through our libraries.

We cannot accept anonymous representations as these would not be legally compliant and cannot be forwarded to the Planning Inspector. You must provide your full name and contact details. Your personal data will be processed in line with our Enfield Local Plan privacy notice and only your name will be shared with the Planning Inspector, not your contact details unless you are invited to participate in the examination process.

**I support the strategy in the Local Plan, do I still need to provide a representation?**

Yes, please. The representation form includes questions where you can tick to say that you believe the Local Plan is sound and legally compliant. It is important that local people can support the Local Plan if they feel it is sound and legally compliant.

**What will happen to my comments?**

All valid representations received during the representation period will be sent to the Planning Inspectorate together with the draft Local Plan and supporting documentation.

**What happens after the representations period?**

The Planning Inspectorate will conduct an independent review of the plan and the representations made, to determine whether the plan is sound. This is called an Examination in Public. Further information about the examination in public will be posted on this page in due course.

**Please note** - your name and response will be made public as part of the examination process and that this is required by legislation and therefore complies with GDPR.

**Physical copies of the representation form will also be available at Enfield hub and community libraries, and can be posted to:**

Planning Service
Enfield Civic Centre
Silver Street
Enfield
EN1 3BR

Hard copies of the Local Plan can also be inspected at Enfield hub and community libraries. Hard copies of this draft Local Plan can also be made available at a cost by contacting the Local Plan team by telephone on 020 8379 3866 or via email or by post (see above).

Please see the Statement of representations procedure (PDF, 168.67 KB) for full details or refer to the frequently asked questions section below.

### Consultation on the Transport Strategy

Alongside the consultation on the Local Plan 2041, we invite residents to share their comments on the draft Enfield Transport Strategy and draft Place Shaping Framework.

To find out more and share your comments, visit the Let's Talk Enfield project page.

### Frequently asked questions

**What is the representation period or consultation period?**

The regulation 19 representation period is the last stage of public engagement before submitting the draft plan to the Inspectorate for examination. This is a formal process that requires comments on the soundness and legal compliance of the plan only.

**When can I make a representation?**

You can make your representation from 28 March to 20 May 2024. Any late representation received after the representation period will also not be provided to the Inspector.

**When will the representation period start?**

The period for submission of representations will take place from 28 March to 20 May 2024.

**How long will the representation period last?**

The period for submission of representations will extend to 7 weeks, this exceeds statutory requirements.

**Will there be consultation events?**

Four drop in events were held on Tuesday 23 April, Thursday 25 April and two on Tuesday 30 April 2024. There will be no more drop-ins before the end of the regulation-19 publication period.

**Can I have a printed copy of the draft Local Plan?**

The Enfield Local Plan - Regulation 19 pre-submission version March 2024 and all supporting documents can be downloaded and inspected online (see above).

You can inspect physical copies of the documents listed above and the Statement of Representations Procedure at the following locations and as well as all the community libraries in the borough:

- Enfield Civic Centre, Silver Street, Enfield, EN1 3XA
- Enfield Town Library, 66 Church Street, Enfield, EN2 6AX
- Edmonton Green Library, 36-44 South Mall, Edmonton, N9 0TN
- Ordnance Unity Centre Library, 645 Hertford Road Enfield, EN3 6ND
- Palmers Green Library, Broomfield Lane, Palmers Green, N13 4EY

**Where is the evidence base?**

All of the evidence base documents are available for inspection on our evidence base page.

The Local Plan documents, Integrated Impact Assessment, Habitats Regulations Assessment

# Evidence base

Evidence and information we use to create and inform the Local Plan is known as the supporting Local Plan evidence base. You can read and download all of the proposed submission documents that form part of our supporting evidence base using the links below. This supporting evidence has been developed in line with the National Planning Policy Framework and National Planning Practice Guidance, and directly informed the content of the plan.

**Topic papers**

Place-making

Blue and Green Enfield

Design and character

Homes for all

Economy

Town centres and high streets

Movement and connectivity

Environmental protection

Infrastructure planning

Viability

Consultation and duty to cooperate

GIS Layers of the Local Plan Policies Map

## Topic papers

Topic papers are key documents which summarise the evidence used to prepare major policy areas and provide a justification of the approach. They do not provide new evidence but rather summarise and cross reference other evidence base documents.

- Spatial Strategy and Overall Approach Topic Paper (2024) (PDF, 608.04 KB)
- Site Allocation Topic Paper (2024) (PDF, 2485.01 KB)
- Enfield Housing Topic Paper (2024) (PDF, 1090.73 KB)
- Enfield Employment Topic Paper (2024) (PDF, 1256.29 KB)
- Green Belt exceptional circumstances Topic Paper (2024) (PDF, 695.84 KB)
- Growth Topic Paper (LBE) (2021) (PDF, 2174.84 KB)

## 6. Local Newspaper Notice produced by Enfield Communications Team

## 7.Enfield Local Plan Leaflet sent to 130,000 households in the borough

### What is a Local Plan?

**Our Local Plan sets out the vision for future development in Enfield.**

Local Plans are used to help decide on planning applications and other planning-related decisions.

They shape infrastructure investments and determine the future development of our borough - from housing, to new schools and GP surgeries.

Every area in England and Wales is required to have an up-to-date Local Plan in place and review it at least every five years.

The consultation for this Local Plan will start soon. To find out more, visit www.enfield.gov.uk/enfieldlocalplan

### Our Draft Local Plan

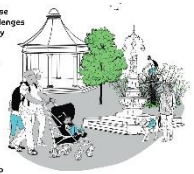
**Enfield is a wonderful London borough, with vast green open spaces, vibrant town centres, diverse character and excellent transport links.**

Our new Local Plan will enable us to protect and enhance these qualities whilst also allowing us to address the national challenges we face, including continuing housing shortages and a rapidly changing environment due to climate change.

Our new Local Plan will enable us to deliver our priorities for the borough:

- More and better homes
- Strong, healthy and safe communities
- Clean and green spaces
- Thriving children and young people
- An economy that works for everyone

Our Local Plan is central to delivering these goals, including more housing, new facilities, and new green infrastructure, to help support a better and more prosperous borough.



For full details visit
www.enfield.gov.uk/enfieldlocalplan

### The final milestones to pass to successfully adopt a new Local Plan for Enfield

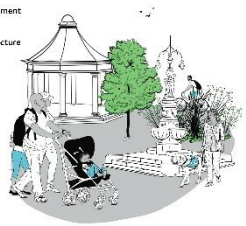
| | |
|---|---|
| March 2024 | Full Council Meeting |
| March 2024 | Commence Reg 19 Consultation<br>Representations to be submitted on the draft Local Plan's 'soundness' |
| May 2024 | Consultation ends |
| Summer 2024 | Submit responses and draft Local Plan to the Secretary of State |
| 2024/25 | Preliminary hearings and examination |
| 2025/26 | Enfield Council adopts new Local Plan |

*These are indicative timescales only, for full details visit www.enfield.gov.uk/enfieldlocalplan

### What our plan will support:

- Greater control over planning and development
- Approximately 34,000 homes
- New parks and enhanced green spaces
- Delivery of new GP surgeries and infrastructure
- Town centres
- Local economy and culture

All of these developments will make Enfield a vibrant, green and connected borough for all.



**For more detail, you can read the draft plan at www.enfield.gov.uk/enfieldlocalplan**

### Investing in Enfield

We see Enfield's Local Plan as an opportunity to invest in Enfield.

Enfield Council is already investing £1 billion to provide 3,500 new Council-led homes in the next 10 years, as well as building thousands of homes at Meridian Water. But this is not enough to meet Enfield's rising housing need. Enfield has a statutory duty to ensure at least 1,246 new homes are provided each year. A new Local Plan will assist us to meet these requirements.

### Our vision for growth

With a new Local Plan in place, the Council will gain greater control to enable growth in the borough, while protecting our town centres, our historic heritage and the majority of the Green Belt in Enfield.

Improvements to our green spaces and waterways will enhance biodiversity and create better air and water quality. Furthermore, the Local Plan aims to open up areas of the Green Belt that are not currently accessible.

We have a borough rich in businesses, big and small. Our new Local Plan will enable us to create new workspaces in town centres and in existing and new industrial locations. We will harness our wonderful creative economy to enrich our town centres.

## Schedule B.3: Full Schedule of Representations from Non Residents Regarding Policies and Site Allocations and Council Response

| Policy | Summary of Main issues | Council Response | Potential to change the plan | Representation ID | Organisation represented |
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| **Chapter 1: Introduction** | | | | | |
| **Key diagram** | Savills, on behalf of Asda, supports the Key Diagram in the Enfield Local Plan, specifically the identification of areas for intensification around transport nodes and Town Centres. | The Council welcomes Asda's support of the Key Diagram in the Enfield Local Plan. The Council appreciate Asda's recognition of the importance of identifying areas for intensification around transport nodes and Town Centres. This strategic focus is essential to achieving sustainable growth, enhancing connectivity, and ensuring vibrant community hubs. The ELP Spatial Strategy and Overall Approach Topic Paper provides a robust framework for focusing development in strategically significant areas, promoting economic growth and sustainable urban living. The Council look forward to continuing our collaboration with key stakeholders like Asda to refine and implement these plans effectively. | Yes | 01732 | Asda Stores Ltd |
| **General and whole plan** | The Greater London Authority (GLA) thanked the London Borough of Enfield (LBE) for consulting the Mayor of London on the pre-publication Enfield Local Plan (ELP). All Development Plan Documents in London must align with the London Plan under the Planning and Compulsory Purchase Act 2004. The Mayor has delegated authority to provide detailed comments, which are summarised in their response. Previously, the Mayor commented on the Enfield New Local Plan 2036 – Issues and Options consultation on 28 February 2019 and the draft Plan on 13 September 2021. Their letter builds on those comments, suggesting further amendments to align the draft Plan more closely with the London Plan 2021 (LP2021), which was published on 2 March 2021 and is now part of Enfield's Development Plan with the most current policies. | Comments noted. The council will agree on a statement of common ground with the Mayor to address these points. | Yes | 00120 | Greater London Authority (GLA) |
| **General and whole plan** | The Metropolitan Police Service Design Out Crime Team emphasises the early integration of crime prevention and counter-terrorism measures in development proposals, aligning with The London Plan and the National Planning Policy Framework (NPPF). The London Plan calls for collaboration between the Mayor, local boroughs, and agencies like the Metropolitan Police to ensure a safe and resilient environment against emergencies, incorporating measures to deter terrorism and design out crime from the start of the design process. These measures should be proportionate, aesthetically integrated, and cost-effective, ensuring developments do not shift vulnerabilities or compromise good design. The NPPF supports this by requiring planning policies and decisions create safe, inclusive, and accessible places that promote well-being, prevent crime, and enhance community cohesion and resilience. | Comments noted. The Council acknowledge the importance of aligning with The London Plan and the NPPF to ensure safe, resilient environments. Our approach will prioritize collaboration with the Mayor, local boroughs, and agencies like the Metropolitan Police to incorporate proportionate, aesthetically integrated, and cost-effective measures. This will help prevent crime, deter terrorism, and promote well-being while maintaining good design principles and enhancing community cohesion and resilience. | No | 01721 | Metropolitan Police Service Design out Crime Team |
| **General and whole plan** | HCC is pleased that the Local Plan addresses flood risk and the use of Sustainable Drainage Systems (SuDS), acknowledging various flood risk sources. They encourage Enfield LPA to consult with Enfield's LLFA team for specific local SuDS and flood risk requirements, ensuring adherence to national policy and best practices, including using a source control approach, restricting to greenfield runoff rates, and applying the Sequential Test. HCC recommends using up-to-date rainfall data (FEH2022) and conservative CV values in drainage calculations. Developments in Enfield must not impede upstream catchments in Hertfordshire from draining and should avoid reducing river and flood zone capacity, with runoff from development sites appropriately treated using SuDS. | Comments noted. The Council acknowledge the importance of adhering to national policies and best practices, including the use of up-to-date rainfall data (FEH2022), conservative CV values in drainage calculations, and ensuring developments do not impede upstream catchments or reduce river and flood zone capacity. We will consult with Enfield's Lead Local Flood Authority (LLFA) team and the Environment Agency to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council. | No | 01755 | Hertfordshire County Council as Lead Local Flood Authority (LLFA) |

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| **General and whole plan** | Historic England appreciates the opportunity to comment on the Local Plan consultation. They emphasize the importance of considering the conservation and enhancement of historic sites throughout the Local Plan process. Their comments, guided by the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG), focus on whether the draft Plan adequately provides for the conservation and enhancement of Enfield's historic environment through strategic policies, ensures the evidence base is current and relevant, and outlines a positive strategy for conservation and enjoyment. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **General and whole plan** | Transport for London (TfL) supports Enfield's draft Transport Strategy, especially its focus on active travel, public transport, and car-free/car-lite development. TfL suggests setting an ambitious sustainable mode share target of 80%, exceeding current goals. They recommend the strategy emphasize reducing car use, especially in town centers, and prioritizing walking and cycling. TfL also requests more detail on proposed improvements to walking, cycling, and public transport networks. They have provided detailed feedback and are committed to continued collaboration for Enfield's transport and growth planning. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | Yes | 01891 | Transport for London |
| **General and whole plan** | Sport England has noted in the Local Plan that there is a lack of indication that the plan has been based on an up-to-date evidence base to support open space, sport and recreation facilities. The National Planning Policy Framework (NPPF) requires local plans to be based on robust, up-to-date assessments of the need for open space, sport, and recreation facilities. Paragraph 102 of the NPPF specifies that planning policies should be informed by assessments of quantitative or qualitative deficits or surpluses, as well as opportunities for new provisions. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **General and whole plan** | Sport England has concerns that the Local Plan is not informed by an adequate evidence base and does not consider or align with the Playing Pitch Strategy (PPS). The plan proposes new sporting developments that may not meet current or future needs, and it advocates for the loss of playing fields and other sports facilities. Consequently, Sport England finds the Local Plan unjustified, ineffective, and not in compliance with the NPPF or Sport England's policies. They object to the Local Plan as it stands and strongly recommend the Council amend the highlighted elements. For further questions or advice, Sport England invites contact. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **General and whole plan** | The London Historic Parks and Gardens Trust (LPG) comments on Enfield's Regulation 19 Local Plan and recommends stronger protections for historic green spaces, particularly under policies BG4, BG5, and BG6. They suggest rewording to ensure that biodiversity restoration and offsetting projects near historic landscapes respect their unique heritage, and call for consultations with statutory bodies and local groups before any development affecting significant historic sites like Whitewebbs Park and Forty Hall. LPG emphasizes the need for enhanced protections and community involvement to safeguard the historical value of Enfield's green spaces in line with the National Planning Policy Framework (NPPF). | Comments noted. The Council understands LGT's recommendation to ensure that landscape restoration and offsetting works within or affecting historic landscapes listed on the Historic England Register of Parks and Gardens preserve their unique design heritage. The Council will work with our stakeholders to consider rewording the policy to include comprehensive consultation with statutory consultees and local amenity groups. This will help ensure that restoration efforts enhance both biodiversity and the historical integrity of these important heritage sites. | Yes | 02083 | London Gardens Trust |
| **General and whole plan** | ADL, representing the Landowner of Stockingswater Lane, appreciates the efforts of Enfield Borough to update its Local Plan with the Draft New Local Plan (DNLP). ADL, known for their vision-led approach and sustainable community-focused developments, supports the Borough's goals for substantial growth, industrial intensification, and sustainable development. They commend Enfield's recognition as a key growth and economic development center, aiming to become the 'Workshop of London' with enhanced employment spaces and environmental improvements. However, ADL expresses concerns about aspects of the DNLP that might limit the delivery of essential employment floorspace. They are keen to engage further with Borough Officers to discuss how their site can contribute to the Borough's growth objectives. | Comments noted. The Council appreciates ADL's support for the Draft New Local Plan (DNLP) and their commitment to sustainable, community-focused development. The Council's strategy, as detailed in the Employment Land Review, Employment Topic Paper, and Spatial Strategy and Overall Approach Topic Paper, aims to ensure the delivery of essential employment floorspace while fostering growth and environmental improvements. The Council acknowledge ADL's concerns and welcome further engagement to discuss how their site at Stockingswater Lane can contribute to Enfield's growth objectives. A Statement of Common Ground will be beneficial for collaborative planning and development. | No | 01682 | Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). |

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| **General and whole plan** | ADL shares their concept scheme: 'The Brimsdown Concept Scheme'. This proposes a large-scale industrial development in Enfield, aiming to deliver over 96,000 sqm of flexible industrial space, aligning with the borough's Local Plan and strategic goals for job creation and industrial intensification. The project focuses on creating market-leading industrial spaces for a variety of businesses, enhancing worker amenities, and integrating environmental improvements such as green infrastructure and biodiversity initiatives. The scheme also emphasizes the importance of sustainable development with features like renewable energy and green spaces, while aiming to meet high environmental standards such as BREEAM "Outstanding". They make the following recommedations:<br>1. Maximize job creation by offering diverse industrial spaces for SMEs and large corporations.<br>2. Enhance worker wellbeing through amenities like rooftop terraces, cafes, and green spaces.<br>3. Prioritize environmental improvements, including green infrastructure and connections to Enfield's 'Green Loop'.<br>4. Ensure the industrial design is innovative and multi-storey to optimize space and meet industrial demand.<br>5. Align development with Enfield's strategic goals for employment growth and sustainable industrial expansion. | The Council is generally supportive of developments that expand industrial and logistics spaces, such as the Brimsdown Concept Scheme. The plan aligns with the Council's strategic goal to deliver 304,000 sqm of additional employment floorspace, especially in designated industrial areas like Brimsdown. The Council's focus is on ensuring developments meet high design, sustainability, and job creation standards. However, any proposal must also address infrastructure impacts and contribute to the borough's long-term economic goals | No | 01682 | Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). |
| **General and whole plan** | The respondent, Areli on behalf of the landowner, indicates their support for the Local Plan, stating that they find it both legally compliant and sound. No modifications are suggested for legal compliance or soundness. However, they express a desire to participate in the examination hearing sessions, indicating a commitment to engaging positively with the Local Plan process to contribute to its development and ensure the representation of their interests. | We acknowledge ADL's positive feedback confirming that the plan is both legally compliant and sound. Their request to participate in the examination hearing sessions has been noted, and the Council will inform you of the details once the Inspector identifies the matters for examination. We appreciate ADL's continued engagement and look forward to their valuable input during the examination process to ensure the plan meets the borough's strategic objectives. | No | 01682 | Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). |
| **General and whole plan** | Savills, representing Asda Stores Ltd, has provided feedback on the emerging Enfield Local Plan 2019-2041 during the Regulation 19 consultation. Asda, a key stakeholder in Enfield with multiple foodstores generating local jobs, has a vested interest in the policy formulation to ensure the Local Plan is deemed 'sound'. While Asda welcomes the overall progress and supports the Council's proactive approach to new development, they have specific comments and concerns about parts of the Plan. Savills expresses a desire to discuss these comments in more detail with Enfield Officers to aid in the Plan's finalisation. | The feedback on the emerging Enfield Local Plan 2019-2041 is welcomed. The council appreciate Asda's role as a key stakeholder and value their support for Enfield's proactive approach to development. The council acknowledge their specific comments and concerns and are committed to ensuring the Plan is 'sound' and beneficial for all stakeholders. The council welcome the opportunity to discuss these in more detail with you to collaboratively refine the Plan and willing to enter into a statement of common ground. | No | 01732 | Asda Stores Ltd |
| **General and whole plan** | ARGO Real Estate Limited submits a report titled: The Benefits of Data Centres in the UK (May 2024). The document discusses the critical role data centres play in the UK's digital infrastructure, supporting various industries, from telecommunications to AI, and contributing significantly to the economy. Data centres generate substantial employment and GVA both during construction and operation. Their benefits include local economic spill-over effects, clustering of related industries, and enhancing productivity across sectors like finance and retail. The report also highlights the industry's efforts toward sustainability and achieving net-zero carbon emissions. The recommendation is for planning authorities, particularly in the London Borough of Enfield, to explicitly support the development of data centres in designated industrial areas within their Local Plans to meet the growing demand and maximise the socio-economic benefits they bring. | Comments noted. The Council recognizes the importance of emerging data-driven and high-technology industries. The Council will collaborate with ARGO Real Estate Limited on a statement of common ground to ensure the Draft Local Plan aligns with national and regional policies and supports sustainable economic growth. | No | 01733 | ARGO Real Estate Limited |

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| **General and whole plan** | Argo Real Estate Limited's response to the Enfield Draft Local Plan supports the Borough's efforts to promote intensified use of industrial land, particularly within Strategic Industrial Locations (SIL). However, they emphasize the need for greater flexibility in the plan's policies to accommodate emerging industrial and technological sectors, such as data centres, alongside traditional industrial and logistics uses. Argo Real Estate stresses that the Local Plan must align with national and regional policies, be adaptable, and ensure sustainable development while maximizing the potential of Enfield's industrial land. | Comments noted. The Council recognizes the importance of emerging data-driven and high-technology industries. The Council will collaborate with ARGO Real Estate Limited on a statement of common ground to ensure the Draft Local Plan aligns with national and regional policies and supports sustainable economic growth. | Yes | 01733 | ARGO Real Estate Limited |
| **General and whole plan** | The Diocese of London, represented by Iceni Projects, supports the Enfield Local Plan 2019-2041, stating it is both legally compliant and sound. They wish to participate in the examination hearings to advocate for their site, which they believe is suitable for various uses and could help address potential shortfalls in the Local Plan. While generally supportive, they are open to suggesting minor amendments to improve the plan and ensure it meets the borough's future needs. | The Council appreciates the Diocese of London's support for the plan's legal compliance and soundness, and we acknowledge their interest in participating in the examination hearings to advocate for their site as a potential solution to any needs shortfall. | No | 01744 | Diocese of London |
| **General and whole plan** | Form provided to say, please refer to Section 6 of the attached Representations document | Noted. | No | 01921 | Ikea Properties Investments Ltd |
| **General and whole plan** | IKEA's submission discusses the transport considerations for the redevelopment of the former IKEA Tottenham store at Meridian Water, highlighting its strategic location in the Lee Valley Opportunity Area. It emphasizes the site's strong public transport connectivity, with proximity to the Meridian Water National Rail station and bus interchange, and the potential for increased bus and rail services to support high-density, residential-led development. It concludes that the site can accommodate up to 3,000 homes, with no significant constraints on public transport or highways capacity, and recommends supporting the development through sustainable travel infrastructure. | Comments noted. The Council is committed to working collaboratively with Ikea Properties Investment and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01921 | Ikea Properties Investments Ltd |
| **General and whole plan** | London Wildlife Trust welcome and support the policies in this chapter. | Support noted. | No | 01974 | London Wildlife Trust |
| **General and whole plan** | London Wildlife Trust welcome and support the policies in this chapter, especially Policy SC1 parts 1b) and d). | Support noted. | No | 01974 | London Wildlife Trust |
| **General and whole plan** | London Wildlife Trust welcome and support the policies in this chapter BG1-13, with a few comments on the following: | Support noted. | No | 01974 | London Wildlife Trust |
| **General and whole plan** | London Wildlife Trust suggests that under 1 i), there should be an explicit reference to the London Environment Strategy (2018, and due for revision), which sets out habitat restoration and creation targets. They note that the London Biodiversity Action Plan (last updated in 2008) is likely to be replaced by the London Nature Recovery Strategy in 2025. The borough will need to establish finer-scale habitat and species targets, similar to LB Hounslow's Local Nature Recovery Plan (2024). | Support noted. | No | 01974 | London Wildlife Trust |
| **General and whole plan** | The Hadley Wood Neighbourhood Planning Forum (HWNPF) argues that the plan-making process has been flawed from the beginning, with predetermined outcomes and insufficient consultation with key stakeholders and local residents. They accuse the Council of ignoring the approximately 1,000 representations submitted during the Regulation 18 consultation, including their own detailed submission. The Forum emphasizes that there has been little to no engagement with the Hadley Wood community, despite the area having its own adopted Neighbourhood Plan. They argue that the Local Plan fails to reflect the policies and aspirations of the Hadley Wood Neighbourhood Plan, particularly its stance on protecting the Green Belt. | Comments noted. The ELP Spatial Strategy outlines the extensive consultation process undertaken during the plan's development, including multiple stages of public and stakeholder engagement. It emphasizes that all representations, including those from HWNPF, were considered in shaping the final draft. The Site Allocation Topic Paper reaffirms that the site selection process was informed by public feedback and technical assessments. It acknowledges the significant input from local communities and planning bodies, including the HWNPF, but argues that the need to meet housing targets necessitated difficult decisions, including the allocation of certain Green Belt sites. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |

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| **General and whole plan** | The Hadley Wood Neighbourhood Planning Forum (HWNPF) questions the legality and soundness of the Local Plan, claiming that the Council has not sufficiently consulted with relevant stakeholders or adhered to national guidelines. They assert that the process lacks transparency and that the plan fails to meet the legal tests of soundness, particularly regarding consultation and evidence-based planning. | Comments noted. The Local Plan has been developed through an extensive consultation process, engaging with stakeholders, including local communities and planning bodies. The strategy emphasizes that the plan complies with all legal requirements, including the duty to cooperate with neighboring authorities and stakeholders. The Site Allocation Topic Paper outlines the evidence base supporting the site selections and the legal framework governing the plan's development. The Council has adhered to all procedural requirements, ensuring that the Local Plan is both legally compliant and sound. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **General and whole plan** | Troy Planning + Design on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood Forum (HWNF) questions the legal compliance of the Local Plan, particularly regarding the evidence base and consultation process. The HWNF argues that Enfield Council has not sufficiently demonstrated that all other alternatives, such as brownfield sites, have been exhausted before considering Green Belt land for development. | Comments noted. The Local Plan has been developed in line with national policy frameworks, including the NPPF, which allows for Green Belt boundary reviews under exceptional circumstances. The plan has undergone extensive consultation and has been adjusted based on stakeholder feedback.<br>The Site Allocation Topic Paper reinforces that the site selection process, including RUR.02, is evidence-based and conforms to both local and national planning policies. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **General and whole plan** | The Hadley Wood Neighbourhood Forum requests that the Enfield Local Plan strengthen references to the Hadley Wood Neighbourhood Plan policies (HW-1 to HW-19) by explicitly confirming their conformity with the strategic policies of the Enfield Local Plan and their continued validity. They suggest adding this clarification to paragraph 1.17 and as a note in Table 1.2. The Hadley Wood Neighbourhood Plan, which was adopted unanimously by the Full Council on 22nd November 2023 following a referendum with over 95% support, was developed in close collaboration with Enfield Council Officers to ensure consistency with the Independent Examiner's report, the London Plan 2021, and the emerging policies in the 'Enfield Draft Local Plan Regulation 19 March 2024'. | The Council acknowledges and appreciates the Hadley Wood Neighbourhood Forum's dedication to the development of the Hadley Wood Neighbourhood Plan, which was successfully adopted following unanimous approval by the Full Council on 22nd November 2023. As the Neighbourhood Plan is now formally "made," it holds full weight in planning decisions within the Hadley Wood area. The Hadley Wood Neighbourhood Plan (HW-1 to HW-19) will continue to be used in determining planning applications in the neighbourhood area. We will consider the suggested enhancements to the Enfield Local Plan, particularly the additions to paragraph 1.17 and Table 1.2, to further clarify the relationship between the Neighbourhood Plan and the Local Plan. | No | 01669 | Hadley Wood Neighbourhood Planning Forum |
| **General and whole plan** | The EnCaf Land Use Working Group (ELUWG) provides their contact details. | Comment noted. This change is not considered to be necessary to make the policy sound. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **General and whole plan** | The EnCaf Land Use Working Group (ELUWG) provides their contact details. | Comment noted. This change is not considered to be necessary to make the policy sound. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **General and whole plan** | Enfield Roadwatch Action Group, initially opposing Green Belt development south of Enfield Road, has expanded its focus to wider Green Belt threats in Enfield Chase. They emphasize that their 2019 report, created with The Enfield Society and CPRE-London, demonstrates sufficient brownfield sites to meet housing targets, making Green Belt release unnecessary. The group highlights significant public opposition to Green Belt development, evidenced by extensive responses to consultations and a petition with over 38,500 signatures advocating for Green Belt protection. More details can be found in their ongoing Change.org petition. | Comments noted. Enfield Roadwatch Action Group's concerns about Green Belt release in the Local Plan are justified through extensive evidence provided by Enfield Council. The "Spatial Strategy and Overall Approach Topic Paper" and the "Exceptional Circumstances Topic Paper" justify the balanced development approach, emphasizing sustainable growth patterns. The "Housing Topic Paper" and "Site Allocation Topic Paper" ensure comprehensive evaluation of housing needs and site suitability, showing that brownfield sites were considered first. Additionally, the "Duty to Cooperate Statement" illustrates that before considering Green Belt sites, Enfield Council reached out to its Duty to Cooperate partners to formally request about accommodating Enfield's housing needs. This cooperative approach aligns with strategic priorities and demonstrates robust planning and compliance. | No | 01687 | Enfield Road Watch |
| **General and whole plan** | Better Homes Enfield submits their contact details. | Recieved with thanks. | Yes | 01708 | Better Homes Enfield |

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| **General and whole plan** | Better Homes Enfield's representation is a compilation of responses to various sections of the Enfield Local Plan (ELP), specifically critiquing different policies and site allocations. The group argues that several aspects of the plan are not legally compliant or sound according to the National Planning Policy Framework (NPPF) and the London Plan. They highlight concerns about the inadequacy of housing allocations, the lack of specificity in affordable housing provisions, and the failure to optimize key development sites, among other issues. The responses indicate that Better Homes Enfield believes the plan does not sufficiently address housing needs, particularly in terms of maximizing the potential of brownfield sites and ensuring a mix of housing types that meet local demands. The recommendations from Better Homes Enfield generally call for revisions to the ELP that would increase housing capacity, particularly on key sites like Meridian Water, and ensure that the plan includes more detailed and enforceable policies on affordable housing, housing mix, and environmental sustainability. They also suggest that the plan should better reflect local needs and the strategic objectives of the London Plan by optimizing the use of available land and providing clear guidance on the development process. Overall, the group advocates for a more ambitious and detailed approach to planning that would make the ELP both legally compliant and more effective in delivering sustainable growth in Enfield. | Comments noted. The ELP's approach to housing allocations and site optimization reflects a strategic balance between meeting housing needs and maintaining sustainable growth across the borough. The Spatial Strategy and Overall Approach Topic Paper emphasizes that the ELP is designed to deliver a substantial increase in housing, focusing on key growth areas such as Meridian Water, where extensive planning and infrastructure investment are already underway. The current housing allocations are based on comprehensive assessments of site capacities, environmental constraints, and infrastructure capabilities, ensuring that development is both feasible and sustainable. This approach is consistent with the London Plan's emphasis on optimizing land use through a design-led approach, which balances higher density development with the need to maintain the character and livability of neighborhoods. The ELP includes robust policies aimed at delivering a significant amount of affordable housing, with targets aligned with the strategic objectives of the London Plan. The Topic Paper explains that the plan's approach to affordable housing is guided by viability assessments and the need to ensure that developments are deliverable within the current market context. The ELP's policies on housing mix are designed to meet the diverse needs of Enfield's population, ensuring that new developments include a range of housing types and tenures to support different demographic groups. The flexibility within the ELP allows for adjustments to be made as market conditions evolve, ensuring that the plan can respond effectively to changing housing demands while maintaining the strategic goals of sustainable development and social inclusion. In summary, the ELP's spatial strategy and overall approach are grounded in a comprehensive and evidence-based planning framework that aligns with both the London Plan and the National Planning Policy Framework (NPPF). The plan's focus on strategic growth areas, such as Meridian Water, and its policies on housing mix and affordability, are designed to ensure that Enfield can meet its housing needs in a sustainable and equitable manner. The ELP's flexibility and adaptability further ensure that it remains responsive to the evolving needs of the borough, making it both legally compliant and effective in delivering "Good Growth" for Enfield. | Yes | 01708 | Better Homes Enfield |
| **General and whole plan** | The Enfield Society's submits their Front page of representation. | Received with thanks. | No | 01794 | Enfield Society |
| **General and whole plan** | The Enfield Society's submits a document outlining the Enfield Chase Restoration Project, focusing on preserving the newly restored woodland and supporting community amenities. The key concerns relate to maintaining biodiversity, protecting Enfield Chase from inappropriate development, and enhancing the area for public use. Recommendations include ongoing practical conservation efforts, working with partners, and raising funds to support these initiatives. The overarching goal is to ensure that Enfield Chase remains a valuable natural and recreational asset for future generations while fostering community engagement and sustainability. | The Chase Park Topic Paper outlines the development plan for creating a sustainable neighborhood with up to 3,765 homes in a phased approach, balancing housing needs with the preservation and enhancement of green and blue infrastructure. The plan emphasizes a landscape-led approach, integrating new parks, green corridors, and sustainable drainage systems, while prioritizing improved public transport and active travel routes. Green Belt release is justified under exceptional circumstances, and the development will provide affordable family housing, enhanced community spaces, and improved connectivity, all aligned with sustainability goals for long-term viability. | No | 01794 | Enfield Society |
| **General and whole plan** | The Enfield Society opposes the urbanization of Merryhills Way as part of the Chase Park development under Policy PL10, citing the importance of the area as a public right of way, a gateway to Trent Park, and a vital green space that supports biodiversity and the community's mental and physical well-being. The Society highlights public feedback collected through surveys, which overwhelmingly supports preserving the natural countryside character of Merryhills Way. They argue that the development would threaten wildlife, reduce the area's recreational value, and negatively impact residents' mental health, especially since the space proved essential during the COVID-19 lockdown. The Enfield Society recommends that the Council protect Merryhills Way in its current state and reconsider any plans that would urbanize this important community asset. | The Chase Park Topic Paper justifies the development by emphasizing the balance between housing and environmental considerations. It acknowledges the value of existing green spaces and integrates plans for new parks, green corridors, and sustainable drainage systems. In line with the National Planning Policy Framework (NPPF), the development will include compensatory environmental improvements, such as new public parks, enhanced access to the countryside, and biodiversity enhancements. This approach seeks to mitigate the impact on existing green spaces while delivering essential housing and infrastructure. | No | 01794 | Enfield Society |
| **General and whole plan** | The Statement of Heritage Significance for Enfield Chase, prepared by ACTA on behalf of The Enfield Society, assesses the area's historical, evidential, aesthetic, and communal importance. Enfield Chase has a long history dating back to the | Comments noted. The Enfield Local Plan's policy on PL10 is justified. The Chase Park Topic Paper outlines the proposed development of Chase Park, which aims to create a sustainable, landscape-led community of approximately 3,765 homes. | No | 01794 | Enfield Society |

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| | 12th century as a hunting ground, later evolving through phases of land use including timber production, grazing, and enclosure. The Chase holds significant evidential value due to its well-documented history, aesthetic value from its landscape and views, and communal value for the local population, with footpaths, open spaces, and cultural significance tied to the identity of Enfield. The Chase's heritage is further enriched by its associations with royalty and historical figures. The report emphasizes preserving the landscape's historical features while managing modern pressures. | It emphasizes balancing housing needs with the protection of green infrastructure by integrating natural landscapes, public parks, and improved transport connectivity. The plan justifies releasing Green Belt land under exceptional circumstances, with compensatory improvements such as new parks and public amenities. Key priorities include enhancing public transport, walking and cycling routes, managing environmental factors like watercourses and flood zones, and maintaining ongoing community engagement to align with local needs and sustainability goals. | | | |
| **General and whole plan** | The Heritage Impact Assessment for the Crews Hill Placemaking Area submitted by the Enfield Society evaluates the potential harm of proposed development on key heritage assets, including Owls Hall, The Paddocks, Glasgow Stud Farm, and Whitewebbs Road Pumping Station. The report identifies significant risks to Owls Hall and The Paddocks, whose rural settings would be suburbanized, causing substantial harm to their historical value. Moderate harm would be inflicted on Glasgow Stud Farm, while the impact on Whitewebbs Road Pumping Station would be minimal. The recommendations emphasize reworking the development framework to protect the agricultural landscapes and historical settings of these assets, ensuring any harm is clearly justified and aligns with national planning policies. | The Crews Hill Topic Paper (2024) outlines plans to transform the area into a sustainable residential community, proposing up to 5,500 homes, with 3,350 expected within the plan period. The development focuses on addressing Enfield's housing needs while maintaining environmental sustainability through the release of Green Belt land under exceptional circumstances. The proposal emphasizes enhancing public transport, including improved services around Crews Hill railway station, and promoting active travel through new walking and cycling infrastructure. Additionally, the plan includes creating new public parks, green corridors, and biodiversity improvements, alongside local centers offering retail and community services to support the growing population. The goal is to create a well-connected, environmentally sustainable neighborhood that integrates housing, community facilities, and green spaces. | No | 01794 | Enfield Society |
| **General and whole plan** | The Enfield Society's submits a Map. | Received with thanks. | No | 01794 | Enfield Society |
| **General and whole plan** | The Enfield Society's submits their written Representations to Planning Committee 21 November 2023 Item 6. Arnold House, 66 The Ridgeway 23/00032/FUL To be circulated to all members of Planning Committee. This document expresses concerns about the proposed demolition of Arnold House, an important heritage asset, and the lack of consideration for its heritage significance in the planning process. The Society also raises issues regarding a possible road connection through the site, linking it to the proposed Chase Park development, which they believe influenced the decision to demolish the building. They argue that this road connection would harm the local environment, including a Site of Importance for Nature Conservation (SINC), and that the potential impact on the Local Plan should have been disclosed in the planning report to the committee. The Society recommends delaying the decision until these concerns are addressed. | Comments noted. The Enfield Local Plan carefully balances the need for new housing and infrastructure with heritage preservation. The decision regarding Arnold House must be viewed in the broader context of the Local Plan's objectives, particularly for Chase Park. The proposed road connection is essential for creating accessible, well-connected neighborhoods and supporting planned housing developments. The Local Plan highlights that any development affecting heritage assets will undergo thorough assessment and mitigation efforts, in line with national and local policies, including the National Planning Policy Framework (NPPF). This ensures that heritage conservation is considered alongside necessary infrastructure improvements. The Site Allocation Topic Paper emphasizes that the Council is committed to enhancing both the built environment and green infrastructure. In this context, the road through the Arnold House site is part of a wider strategy to facilitate sustainable growth, while minimizing environmental and heritage impacts. The Council will ensure that any harm to heritage assets like Arnold House is justified by the wider public benefits of the development and aligned with policy requirements. | No | 01794 | Enfield Society |
| **General and whole plan** | The Enfield Society's submits  Enfield's Local Plan EVIDENCE BASE Area of Special Character Boundary Review March 2013. The document reviews Areas of Special Character (AOSC) in Enfield, emphasizing the need to preserve landscapes of historical, ecological, and community value. It highlights areas such as Enfield Chase, Trent Park, and Theobalds Estate for their historical significance and agricultural landscapes like Merryhills Brook Valley for their biodiversity. The review identifies threats from urbanization and calls for boundary updates to protect these areas from inappropriate development. Key recommendations include adjusting AOSC boundaries, enhancing protection measures, and promoting sustainable land-use practices to maintain the unique character of these landscapes amidst development pressures. | The Chase Park Topic Paper focuses on sustainable development while maintaining a balance between housing needs and preserving green infrastructure and heritage assets. The concerns about the potential impact on Enfield's heritage assets, such as those mentioned in the document regarding the Crews Hill area, are acknowledged. The Council recognizes the value of these historical sites and will ensure that the development adheres to National Planning Policy Framework (NPPF) guidelines, which require a thorough heritage impact assessment to be carried out before any planning permissions are granted. In line with the Chase Park development framework, the Council is committed to minimizing any negative impacts on heritage assets through sensitive planning, landscape integration, and environmental compensation measures. Green spaces and community amenities will be created to compensate for any loss of rural character, and ongoing public consultations will ensure that local stakeholders have a voice in how these areas are developed. This process includes identifying and mitigating any potential harm to heritage sites, ensuring that both Enfield's historical significance and its future housing needs are appropriately balanced. | No | 01794 | Enfield Society |

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| **General and whole plan** | The Enfield Society's submits Map showing built up areas - received. | Received with thanks. | No | 01794 | Enfield Society |
| **General and whole plan** | The Enfield Society's submits The Enfield Society Records and Research Group 1930s Purchase of the Enfield Chase Green Belt Report. It details the origins of the Enfield Chase Green Belt, focusing on its preservation during the 1930s in response to increasing urbanization. The land, acquired by Middlesex County Council and the London County Council, was purchased from significant landholders such as the Duchy of Lancaster and Trinity College, Cambridge. The primary motivation was to protect these scenic areas for public use and health benefits, as well as to maintain historical and ecological value. The review emphasizes the strategic importance of these lands for preserving the natural countryside amidst rapid urban development. | The Chase Park Topic Paper (2024) outlines the development plan for Chase Park, focusing on the creation of a sustainable neighborhood that balances housing needs with environmental preservation. The document emphasizes the strategic release of Green Belt land, which is justified under exceptional circumstances, to provide housing, enhance public spaces, and improve connectivity within the borough. It ensures that any development aligns with the broader goals of environmental sustainability, including the protection of key landscapes, historical features, and biodiversity. In response to the historical concerns raised by the Enfield Society regarding the 1930s acquisition of Enfield Chase Green Belt, the Chase Park development integrates principles of land preservation while addressing contemporary housing needs. The Chase Park Topic Paper supports the idea that development can coexist with environmental and historical conservation efforts. Green Belt release will be paired with compensatory measures such as new public parks, enhanced biodiversity corridors, and sustainable urban planning practices that respect the historical value of the land. This strategy ensures that the development aligns with both the heritage of the area and the future needs of the community, protecting Enfield's natural assets while enabling growth. | No | 01794 | Enfield Society |
| **General and whole plan** | Enfield Chase London Borough of Enfield Local Plan 2019-2041 Regulation 19 Consultation Stage Draft Policies PL9, PL10, PL11, DE11 and DE5 LANDSCAPE APPRAISAL on behalf of The Enfield Society May 2024 - report, received. The document provides a landscape appraisal of Enfield Chase, focusing on how proposed developments in Chase Park and Crews Hill will impact the landscape. The assessment highlights concerns about the Landscape Sensitivity Assessment (LSA) conducted by the Council, suggesting it underestimates the cultural, historical, and scenic value of the area, particularly in relation to Enfield Chase's historical significance. The appraisal also critiques the lack of consideration for the height and density of proposed buildings, raising concerns about visual impacts on long-distance views, such as from The Ridgeway. It recommends more thorough analysis of the area's landscape to ensure developments align with both historical preservation and environmental sustainability. | Both the Chase Park Topic Paper (2024) and Crews Hill Topic Paper (2024) emphasize a balanced approach to development, integrating new housing with the protection of green infrastructure and historical landscapes. The developments in Chase Park and Crews Hill are designed with a focus on sustainability, ensuring that Green Belt release is compensated with new parks, biodiversity improvements, and enhanced public amenities. These plans also prioritize preserving long-distance views and the rural character of Enfield, with careful attention to building heights and densities to minimize visual impacts. In response to concerns about landscape sensitivity, both topic papers underscore the Council's commitment to maintaining the cultural and environmental value of these areas while meeting housing needs, ensuring that urban expansion aligns with historical preservation and environmental sustainability. | No | 01794 | Enfield Society |
| **General and whole plan** | The Enfield Society's submits Enfield Regulation 19 Local Plan, Landscape Supporting Graphics. | Received with thanks. | No | 01794 | Enfield Society |
| **General and whole plan** | The Enfield Conservative Group, comprising 25 councillors from 10 wards, has drafted a response to the Enfield Draft Plan. This document outlines their principal objections and includes specific objections in the Appendices and supplementary information in the Annexes. The response was prepared by experienced councillors with contributions from the entire group and external advisers working pro bono. | The detailed response to the Enfield Draft Plan are acknowledged. | No | 01670 | Enfield's Conservative Group |
| **General and whole plan** | The Conservative Group provides the council with the GLA's response to Regulation 18 (2021). | Recieved with thanks. | No | 01670 | Cllr Rye |
| **General and whole plan** | The Enfield Conservative Group submits a note used at Opposition Business, on the group's position on the Enfield Local Plan, particularly in relation to the process of its development and key issues such as Green Belt protection and building heights. The Enfield Conservative Group raises concerns about the process used to formulate the current draft of the Local Plan, noting that it was developed without input from other political groups, a departure from previous practices. They argue that this lack of collaboration has resulted in a draft that does not fully align with key themes in the London Plan 2021 and the National Planning Policy Framework, particularly regarding the protection of the Green Belt. The group also points out that while the public consultation generated a significant number of responses, many residents expressed concerns about the Plan, particularly its | Comments noted. The Local Plan is informed by an evidence-based approach, aligning with the strategic objectives set out in the London Plan 2021 and the National Planning Policy Framework (NPPF). The Spatial Strategy and Overall Approach Topic Paper highlights that the Local Plan was developed to address Enfield's specific needs, including housing, infrastructure, and environmental sustainability. While the Conservative Group has noted the absence of input from other political groups, the development process did involve comprehensive public consultations and the incorporation of feedback to ensure that the Plan is both robust and responsive to community needs. Regarding the Green Belt, the Council conducted a thorough Green Belt Review as part of the plan-making process, ensuring that any proposed changes are justified by "exceptional circumstances," | No | 01670 | Cllr Skelton |

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| | proposals for Green Belt development, indicating that the draft may not have broad support from the community. To address these issues, the Conservative Group recommends the establishment of a cross-party group to review the draft Local Plan and make recommendations to the Cabinet and Council, ensuring a more inclusive and representative planning process. They also call for the Full Council to debate the revised Local Plan before its final submission, with a specific emphasis on reconsidering proposals for building on the Green Belt in light of opposition from the Mayor of London, the National Government, and local residents. Additionally, they suggest that careful consideration should be given to where taller buildings may be appropriate, to ensure that these developments are in line with the borough's character and needs. | as required by national policy. This review carefully considered the borough's housing pressures, the availability of brownfield sites, and the need for sustainable growth. The Plan also includes provisions for infrastructure improvements to support new developments, ensuring they are sustainable and aligned with both local and regional planning guidelines. The Council is committed to continuing to engage with all stakeholders, including political groups and the public, as the Plan progresses to ensure it reflects the needs and priorities of the entire community. | | | |
| **General and whole plan** | The Councillor for Southgate Ward noted that there has been no meaningful cross-party dialogue on the issue. | Comments noted. The Council asserts meaningful cross-party discussions have been an integral part of the planning process. These discussions have included regular meetings and consultations with representatives from all parties to ensure that a wide range of perspectives is considered and integrated into the plan, as set out in this consultation statement. | No | 01836 | Cllr Morreale |
| **General and whole plan** | The Councillor for Southgate Ward noted that residents have found the consultation process particularly difficult to respond to, which has discouraged participation. As a result, some residents did not respond directly and instead submitted their feedback through the Enfield Society. | Comments noted. | No | 01836 | Cllr Morreale |
| **General and whole plan** | The Councillor objects to the entire Local Plan, arguing that it fails to consider the reduced housing need due to a decline in London's population since Brexit and the shift to remote working post-COVID, as evidenced by falling school rolls. He asserts there are sufficient brownfield sites available and suggests the plan is driven by financial concerns rather than genuine housing demand. He strongly opposes the proposed release of Green Belt land, which he believes will destroy historic open spaces and harm the borough's natural environment. Additionally, he criticizes the plan's focus on high-rise buildings, likening them to the failed tower block developments of the 1960s and 70s, which he fears will urbanize and damage the character of market town centres. | Comments noted. The Local Plan seeks to significantly increase the number of new homes to meet a wide range of needs including affordable homes, accessible homes and homes for older people. It also seeks to regenerate and renew the Borough and is considered the be an appropriate strategy. | No | 01890 | Cllr Milne |
| **Chapter 2: Good Growth in Enfield** | | | | | |
| **Spatial Portrait** | LBE SPS supports Enfield's spatial strategy and Strategic Policy SS1, which aims to deliver substantial growth and sustainable development in line with the NPPF. They endorse the housing target of at least 33,280 new dwellings by 2041, noting a minor discrepancy with the Housing Topic Paper's figure of 34,280. They recommend allowing for additional development within the plan period, especially on strategic sites like CHPA, to address long lead times and support early housing delivery. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **Spatial Portrait** | Warmerdam & Co (Crews Hill) Ltd notes a discrepancy between maps in the Draft Enfield Local Plan (ELP). Figure 2.2, which depicts the London Borough of Enfield, shows the 'Crews Hill Placemaking Area' as being within the Green Belt. However, this conflicts with Figure 2.4, which indicates that the area is not within the Green Belt. Warmerden & Co suggests that Figure 2.2 be updated to accurately reflect the current status of the Crews Hill Placemaking Area or be clarified to indicate that the map shows the existing Green Belt boundaries rather than proposed changes. | Noted. The Council suggest a minor modification to align the Green Belt boundary depicted in Figure 2.2 with the boundary shown on the proposals map to ensure clarity and consistency. | No | 01730 | Warmerdam & Co (Crews Hill) Ltd |
| **Spatial Portrait** | London Wildlife Trust supports the recognition of Enfield's natural environment and the need to protect and enhance important sites through the Local Plan. While welcoming references to opportunities for biodiversity enhancement and improving blue and green networks, the response highlights concerns about the tension between environmental protection and development. Specifically, it notes that growth areas like Chase Park and Crews Hill, despite sustainable design efforts, could lead to the loss of open green spaces that are crucial for species like | Support noted. The Council is aware of the challenges of balancing growth with environmental conservation, particularly in areas like Chase Park and Crews Hill. As outlined in both the Crews Hill Topic Paper and the Chase Park Topic Paper (2024), the Council has adopted a landscape-led approach to development, ensuring that master-planning efforts incorporate sustainable design principles to minimise the impact on biodiversity. While there is an acknowledgment that some green spaces may be affected, the Blue and Green Strategy highlights the | No | 01974 | London Wildlife Trust |

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| | skylarks. The response acknowledges the challenge of balancing environmental conservation with housing needs, which is a common issue across London boroughs. | Council's commitment to mitigating these impacts through biodiversity net gain initiatives and green infrastructure enhancements. For example, developments in these growth areas will incorporate ecological corridors, habitat creation, and species-specific measures to protect vulnerable wildlife, such as skylarks. The Local Plan also outlines opportunities to connect residents with nature through enhanced blue and green networks, supporting nature recovery while delivering much-needed housing. The Local Plan aligns with national policy requirements and Enfield's Blue and Green Strategy by striving to protect priority species and biodiversity, even in the face of necessary development, and remains committed to ongoing review and adaptation as part of the planning process. | | | |
| **Spatial Portrait** | London Wildlife Trust support this policy in principle, especially regarding Metropolitan Open Land and the Green Belt. However, we are concerned about the proposed de-designation and loss of Green Belt for new developments at Chase Park and Crews Hill Station. These changes will result in a net loss of land crucial for nature's recovery, despite planned landscape restoration and improved access to the Lee Valley Regional Park as compensation. It is uncertain if this will provide adequate ecological compensation, as it involves not just the amount of space lost but also the species and habitats affected. The highest ecological standards must be adopted for both sites if the Local Plan is approved. While the borough has conducted a Green Belt Review and aimed to minimize Green Belt loss, the significant scale of these proposals could compromise the Council's goal to be a leading green borough. | Support noted. | No | 01974 | London Wildlife Trust |
| **Vision** | Natural England welcomes the Local Plan's aim to make Enfield "A deeply green place," focusing on enhanced biodiversity, climate crisis mitigation and adaptation, and the ambition to become a carbon-neutral Borough. | Support noted. | No | 01743 | Natural England |
| **Vision** | National Highways' response notes that the Local Plan's strategic vision and spatial strategy align with sustainable development principles. However, they raise concerns about a proposed new logistics hub near Junction 24 of the M25, which could increase commuting and commercial traffic along the M25. They require transport evidence at the planning application stage to ensure no unacceptable impacts on the safety or operation of the M25, and prefer pre-application engagement for this proposal. | The Council acknowledges and appreciates National Highways' response, noting the alignment of our Local Plan's strategic vision and spatial strategy with sustainable development principles. We understand and share concerns about the potential impacts of the proposed new logistics hub near Junction 24 of the M25 on commuting and commercial traffic. We commit to providing thorough transport evidence at the planning application stage to ensure there are no unacceptable impacts on the safety or operation of the M25. Additionally, we welcome and encourage pre-application engagement with National Highways to collaboratively address these concerns and develop effective mitigation strategies. Enfield Council looks forward to working together closely to achieve sustainable and safe development outcomes. | No | 01753 | National Highways Limited |
| **Vision** | TfL supports the regeneration and intensification at Meridian Water (PL5) and Southbury (PL6) but questions the feasibility of providing high-frequency sustainable transport to Chase Park (PL10) and Crews Hill (PL11) due to their remoteness and high infrastructure costs, which are likely to result in car dependency. TfL recommends that development at these sites should not proceed without a detailed masterplan, including a Supplementary Planning Document, due to insufficient specifics on infrastructure, transport, layout, and delivery. The strategic transport assessment (STA) identifies road capacity issues during peak times and constrained rail capacity towards central London. High parking levels could lead to increased car usage, undermining public transport and exacerbating congestion. Furthermore, the STA's 75% mode share target is deemed unrealistic compared to the current 49% sustainable mode share in the borough. Detailed transport investment timelines and agreed infrastructure delivery requirements are necessary, particularly for Crews Hill and Chase Park, to ensure the Local Plan and these placemaking areas are adequately supported. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **Vision** | Hertsmere support Enfield's approach towards meeting its employment needs in full across urban and selected Green Belt sites. They agree on not releasing currently designated employment land for housing, recognising the need for updated assessments reflecting changes in work patterns. | Comments noted. The Council is committed to working collaboratively with Hertsmere and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01924 | Hertsmere Borough Council |

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| **Vision** | ADL shares Enfield Borough's ambition to attract new investment into Brimsdown and support existing projects like Meridian Water through industrial land intensification. They acknowledge the pressure on London's workplaces and support the DNLP's target to expand industrial land and employment spaces. ADL backs the promotion of multi-level industrial developments, emphasizing that policies must be carefully crafted to ensure these schemes' viability and appeal to suitable tenants. They are committed to transformative change in Brimsdown, aiming to provide modern employment spaces that meet the expectations of today's and future workforces. ADL has submitted an Initial Concept Scheme to illustrate potential implementation of the DNLP's vision and allocation. | Comments noted. The Council values ADL's shared ambition to attract new investment into Brimsdown and their support for projects like Meridian Water through industrial land intensification. The DNLP's targets for expanding industrial land and employment spaces are crucial for the borough's economic growth, as highlighted in the Employment Land Review, Employment Topic Paper, and Spatial Strategy and Overall Approach Topic Paper. The Council appreciate ADL's submission of an Initial Concept Scheme and welcome further engagement to ensure the viability and appeal of multi-level industrial developments. A Statement of Common Ground will facilitate our collaborative efforts. | No | 01682 | Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). |
| **Vision** | ADL supports the overall ambition of the plan to intensify employment uses at Brimsdown. However, they have provided several suggestions to ensure the plan can achieve these objectives. If these suggestions are appropriately incorporated, ADL believes the plan would meet the tests of soundness, and they would withdraw their representation. | Comments noted. The council appreciate ADL's support for the ambition to intensify employment uses at Brimsdown. The suggestions provided will be carefully reviewed in alignment with the principles set out in the Employment Land Review, Employment Topic Paper, and Spatial Strategy and Overall Approach Topic Paper. These documents underscore our commitment to sustainable growth, industrial intensification, and providing modern employment spaces. The council look forward to further dialogue and collaboration to ensure the Local Plan meets the tests of soundness and addresses ADL's concerns, facilitating the withdrawal of their representation. | No | 01682 | Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). |
| **Vision** | ADL supports the Enfield Local Plan 2041's vision and strategic objectives, which align with Enfield Council's priorities. They see the vision for Brimsdown aligning with these objectives and aim to contribute to the 'Workshop of London' by delivering next-generation employment land. Recognizing that traditional industrial areas lack aesthetic and worker-centric design, ADL supports principles of creating a 'nurturing' and 'deeply green place' to transform Brimsdown into a high-quality industrial area. They welcome Enfield's ambition to be a 'distinct and leading part of London' and view Brimsdown as an exciting opportunity to realise this vision. | Comments noted. The council appreciate ADL's support for the Enfield Local Plan 2041 vision and strategic objectives. The emphasis on transforming Brimsdown aligns with our priorities outlined in the Employment Land Review, Employment Topic Paper, and Spatial Strategy and Overall Approach Topic Paper. These documents highlight the need for modern, aesthetically pleasing, and worker-centric industrial areas. The council is committed to collaborating with ADL to create a nurturing, deeply green, and high-quality industrial area at Brimsdown, ensuring it contributes significantly to Enfield becoming a distinct and leading part of London. Further engagement and a statement of common ground will be pursued to refine these objectives. | No | 01682 | Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). |
| **Vision** | Savills, on behalf of Asda, supports the overall Vision and Strategic Objectives of the Enfield Local Plan, particularly the goal to foster diverse and vibrant town centres. However, Asda emphasizes the need for detailed policies to reflect these objectives and highlights that employment growth should not be limited to traditional sectors (Class E(g), B2, and B8). The retail sector should also be recognized for its significant role in providing diverse job opportunities for local residents. | The council welcomes Asda's supportive feedback on the Vision and Strategic Objectives of the Enfield Local Plan. The council acknowledge the importance of fostering diverse and vibrant town centres and appreciate their emphasis on recognizing the retail sector's role in providing diverse job opportunities. The council agree that employment growth should encompass a broad range of sectors, including retail, to ensure comprehensive local employment opportunities. The council will consider these points to ensure our detailed policies reflect these objectives and contribute to the overall economic health of the borough. The plan's approach aligns with the evidence base in the Enfield Employment Topic Paper 2024 and the strategic objectives outlined in the ELP Spatial Strategy and Overall Approach Topic Paper, ensuring that all employment sectors, including retail, are adequately represented and supported in the Local Plan. | No | 01732 | Asda Stores Ltd |
| **Vision** | Henry Boot Developments' response emphasizes that the Borough should prioritize meeting its employment needs in existing, accessible, and sustainable locations, particularly Strategic Industrial Locations (SIL) and Locally Significant Industrial Locations (LSIL). They criticize the draft Plan for suggesting new locations outside these designations without thorough assessments of existing sites or robust evidence of unmet need. They argue this approach is unsound and ineffective, recommending policy amendments to prioritize existing employment sites and only consider new locations when justified and supported by evidence and necessary infrastructure. | The council's approach to accommodating employment growth in existing Strategic Industrial Locations (SIL) and Locally Significant Industrial Locations (LSIL) is justified and in alignment with the London Plan. The Enfield Employment Topic Paper (2024) emphasizes the importance of optimizing the use of existing employment land to meet the Borough's needs. It highlights that before considering new locations for employment growth, a thorough assessment of existing sites and their potential for intensification is essential. This strategy ensures sustainable development, efficient land use, and the proper alignment with regional policies. The Council will continue to engage with Henry Boot Developments and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01943 | Henry Boot Developments (HBD) |
| **Vision** | Lansdown supports the overall vision of the Enfield Local Plan (2019-2041), especially the focus on delivering housing in a sustainable manner. They believe | Support noted. | No | 01998 | Landsdown |

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| | the plan is well-considered and addresses important challenges such as housing delivery, including affordable and specialist housing for older people. | | | | |
| **Vision** | London Wildlife Trust supports the commitment to creating a 'Deeply Green Place' and objectives 7-12 and 17 of the Local Plan. While Strategic Policy SS1 is supported in principle, particularly regarding Metropolitan Open Land and the Green Belt, there are concerns about the proposed de-designation of Green Belt land for new urban extensions at Chase Park (PL10) and Crews Hill (PL11). These developments could result in a net loss of land that supports biodiversity and nature's recovery. The response acknowledges that the borough has conducted a Green Belt Review to minimise loss and proposes landscape restoration and better access to the Lee Valley Regional Park as compensation. However, it stresses that the ecological compensation and the highest ecological standards will be critical if the Local Plan is adopted, as these large-scale developments could undermine the borough's ambition to be a destination green borough. | Support noted. The concerns about the de-designation of Green Belt land for urban extensions at Chase Park and Crews Hill are understood. As outlined in the Spatial Strategy and Overall Approach Topic Paper (2024), the Council conducted a thorough Green Belt Review to minimise loss and ensure that only essential land is used for sustainable communities. Ecological compensation, including landscape restoration, biodiversity net gain, and enhanced green corridors, is integral to the plan. While early in the process, the strategy focuses on balancing housing needs with ecological resilience, ensuring that Enfield remains a destination green borough with ongoing review to uphold these standards. | No | 01974 | London Wildlife Trust |
| **Vision** | Joanne McCartney, AM for Enfield and Haringey, supports : Making Enfield 'the workshop of London' by supporting quality jobs and expanding workspace in town centres. Efforts to tackle disparities between the east and west of the borough. | Support noted. | No | 01896 | Joanne McCartney AM London Assembly Member for Enfield and Haringey |
| **Strategic Objectives** | The NHS London Healthy Urban Development Unit's proposes amendments to part 2 A nuturing place, with: to reduce physical and mental health inequalities by requiring Health Impact Assessments as part of significant development proposals. To use good design to create walkable and cohesive neighbourhoods, supporting active and socially connected lifestyles, helping to deliver on the priorities of the Enfield Joint Health and Wellbeing Strategy. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | Yes | 01872 | NHS London Healthy Urban Development Unit |
| **Strategic Objectives** | The NHS London Healthy Urban Development Unit's proposes amendments to part 18 A distinct and leading part of London, with: To protect existing community facilities and ensure that new homes are supported by high quality infrastructure, including education, healthcare, sports, cultural facilities and digital connectivity in order to create safe, green and attractive places ~~with~~ to promote a good quality of life and wellbeing. To work with partners to ensure essential facilities are conveniently accessible to residents and secure funding for these amenities, which can be sourced through planning contributions and other infrastructure funding channels. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | Yes | 01872 | NHS London Healthy Urban Development Unit |
| **Strategic Objectives** | The Lee Valley Regional Park Authority (LVRPA) supports the draft Local Plan's emphasis on creating a high-quality, biodiverse, and green environment for Enfield's residents, employees, and visitors. However, they suggest adding a reference to the Regional Park under the Vision theme 'A Deeply Green Place' and strategic objective 12. This inclusion would highlight the Regional Park's significant contribution to the plan's green objectives, given its extensive area within Enfield and its variety of green and blue spaces, sport and leisure venues, and biodiversity. | Comments noted. The detailed feedback is welcomed. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | No | 01918 | Lee Valley Regional Park Authority |
| **Strategic Objectives** | Sport England welcomes that Strategic Objective 18 aims to protect sports facilities and support new homes with high-quality sports facilities. However, they recommend that this objective should be based on current and future needs identified in a robust sport facility strategy and should also include enhancing existing facilities, as improving or expanding current facilities might be the best way to accommodate local growth. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **Strategic Objectives** | LBE SPS supports the spatial vision and strategic objectives in Chapter 2, highlighting that LBE landowner sites within the Crews Hill Placemaking Area (CHPA) contribute to these goals. These sites provide green spaces, new homes, | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of | No | 01946 | LBE Strategic Property |

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| | including affordable housing, and foster a thriving community. Specifically, they enhance housing supply, offer new open spaces, support green and blue infrastructure, and indirectly bolster the local economy. Additionally, sites like Junction 24 are earmarked for employment development, supporting the goal of making Enfield a distinct and leading part of London. | Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **Strategic Objectives** | London Wildlife Trust welcome and support the commitment to establish a 'Deeply Green Place' and the objectives 7-12 and 17. | Support noted. | No | 01974 | London Wildlife Trust |
| **SP SS1: Spatial strategy** | The GLA's response on the housing delivery target in the draft Enfield Local Plan (ELP) sets out the aim to deliver 32,800 new homes from 2019 to 2041 using a stepped target approach. This includes 12,460 homes from 2019 to 2029, which aligns with the LP2021 target. However, the GLA emphasises that the post-2029 target should be based on up-to-date SHLAA and HELAA evidence, and raises concerns about the proposed reliance on Green Belt sites, stressing the need for exceptional circumstances and compliance with LP2021 policies, particularly those protecting the Green Belt. | Comments noted. The Council acknowledges the comments and has meticulously outlined the exceptional circumstances justifying the release of Green Belt land in its Exceptional Circumstances Topic Paper. This document provides a robust rationale for addressing housing and economic challenges through sustainable development. The council is committed to long-term, vision-led planning, recognizing that relying solely on brownfield sites is insufficient for meeting housing needs. This strategic approach is detailed in the Exceptional Circumstances and Housing Topic Papers. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP SS1: Spatial strategy** | The GLA's response on the justification and evidence for the draft Enfield Local Plan's housing target acknowledges that the Housing Topic Paper follows the guidance in LP2021 paragraph 4.1.11. The post-2029 target is based on the 2017 London Strategic Housing and Land Availability Assessment (SHLAA) and additional local evidence, ensuring the target is well-founded and supported by relevant data. | Comments noted. The Council acknowledges the comments and has meticulously outlined the exceptional circumstances justifying the release of Green Belt land in its Exceptional Circumstances Topic Paper. This document provides a robust rationale for addressing housing and economic challenges through sustainable development. The council is committed to long-term, vision-led planning, recognizing that relying solely on brownfield sites is insufficient for meeting housing needs. This strategic approach is detailed in the Exceptional Circumstances and Housing Topic Papers. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP SS1: Spatial strategy** | The GLA's response notes that the draft Enfield Local Plan sets an annual housing target of 1,735 net additional dwellings from 2029 to 2041, based on recent SHLAA and HELAA evidence. | Comments noted. | No | 00120 | Greater London Authority (GLA) |
| **SP SS1: Spatial strategy** | The GLA's response highlights that proposed developments at Chase Park and Crews Hill necessitate Green Belt release and the establishment of exceptional circumstances. The Mayor's support for these developments depends on adherence to LP2021 policies, particularly the protection of the Green Belt under Policy G2. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP SS1: Spatial strategy** | The GLA's response criticises the use of the Government's Standard Methodology by LBE to calculate raw housing need, as it is unsuitable for the London context. Consequently, the Mayor contests the partial justification of the 32,800 housing target based on this methodology. | Comments noted. At the time of writing, the Council clarifies that the NPPF considers the Standard Method as an advisory starting point for housing need calculations across England. There is no exemption for London from this method. The Council remains committed to a brownfield-first approach in line with LP2021 policies, especially Policy G2, while adhering to established exceptional circumstances when necessary. The Exceptional Circumstances and Housing Topic Paper outlines criteria for reviewing green belt boundaries and justifies using the Standard Methodology. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP SS1: Spatial strategy** | The GLA's response expresses concerns about the sustainability of the proposed sites and states that the Mayor's support is contingent on the developments not conflicting with other LP2021 policies, especially those protecting the Green Belt. | Comments noted. The Council emphasizes its commitment to a brownfield-first approach in line with LP2021 policies, especially Policy G2, which protects the Green Belt while allowing for development under exceptional circumstances. The Council's response aligns with Policy G2 objectives when exceptional circumstances are justified. The Exceptional Circumstances topic paper details conditions for reviewing green belt boundaries and releasing areas for housing, | No | 00120 | Greater London Authority (GLA) |

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| | | ensuring any changes adhere to LP2021's Policy G2. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | | | |
| **SP SS1: Spatial strategy** | The Mayor’s response emphasises adherence to existing policies and suggests a more aggressive approach to utilising small sites while maintaining Green Belt protections. | Comments noted. The Council acknowledges the Mayor's initiative to incentivize small site delivery across London and ensures alignment with national planning guidelines. Paragraph 72 of the NPPF recognizes the importance of realistic windfall allowances. Enfield's updated evidence justifies its proposed windfall allowance, moving beyond outdated data from the London SHLAA 2017. However, maintaining balance is crucial to avoid inflating housing requirements beyond capacity and risking under-delivery. Policy H4 reflects Enfield's positive stance on small site growth, aiming for 353 new homes annually. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP SS1: Spatial strategy** | The GLA notes that the draft ELP proposes releasing Green Belt areas to meet housing and industrial capacity targets, with the largest areas at Chase Park and Crews Hill designated for new housing development. | Comments noted. The release of Green Belt land is justified by exceptional circumstances, including population growth, housing shortages, and economic objectives. This balance between development needs and environmental concerns is detailed in the Green Belt Exceptional Circumstances Topic Paper (Mar-24). The Council emphasizes a vision-led, long-term approach to create successful, non-car-dependent neighborhoods with critical mass. Releasing more Green Belt land now allows for strategic, sustainable planning, avoiding piecemeal development. The Council has engaged with stakeholders and the public throughout the planning process, demonstrating transparency and accountability. This ongoing consultation underscores our commitment to inclusive planning and community involvement. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP SS1: Spatial strategy** | The GLA points out that the ELP does not fully justify the release of Green Belt sites. The housing target, which includes Green Belt land at Chase Park and Crews Hill, has been used to justify their release without sufficient explanation. | Comments noted. The release of Green Belt land is justified by exceptional circumstances, including population growth, housing shortages, and economic objectives. This balance between development needs and environmental concerns is detailed in the Green Belt Exceptional Circumstances Topic Paper (Mar-24). The Council emphasizes a vision-led, long-term approach to create successful, non-car-dependent neighborhoods with critical mass. Releasing more Green Belt land now allows for strategic, sustainable planning, avoiding piecemeal development. The Council has engaged with stakeholders and the public throughout the planning process, demonstrating transparency and accountability. This ongoing consultation underscores our commitment to inclusive planning and community involvement. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP SS1: Spatial strategy** | The GLA emphasizes that releasing Green Belt land requires demonstrating exceptional circumstances and exhausting all brownfield options. This includes optimising housing densities in urban areas, particularly around existing transport infrastructure, and maximizing delivery from small sites. | Comments noted. The release of Green Belt land is justified by exceptional circumstances, including population growth, housing shortages, and economic objectives. This balance between development needs and environmental concerns is detailed in the Green Belt Exceptional Circumstances Topic Paper (Mar-24). The Council emphasizes a vision-led, long-term approach to create successful, non-car-dependent neighborhoods with critical mass. Releasing more Green Belt land now allows for strategic, sustainable planning, avoiding piecemeal development. The Council has engaged with stakeholders and the public throughout the planning process, demonstrating transparency and accountability. This ongoing consultation underscores our commitment to inclusive planning and community involvement. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP SS1: Spatial strategy** | The GLA raises serious concerns about the suitability of Chase Park and Crews Hill for development, even if exceptional circumstances are demonstrated. These concerns include challenges in delivering necessary infrastructure for sustainable transport, significant harm to the Green Belt's function, and the low density of housing proposed. | Comments noted. The release of Green Belt land is justified by exceptional circumstances, including population growth, housing shortages, and economic objectives. This balance between development needs and environmental concerns is detailed in the Green Belt Exceptional Circumstances Topic Paper (Mar-24). The Council emphasizes a vision-led, long-term approach to create successful, non-car-dependent neighborhoods with critical mass. Releasing more Green Belt land now allows for strategic, sustainable planning, avoiding piecemeal development. | No | 00120 | Greater London Authority (GLA) |

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| | | The Council has engaged with stakeholders and the public throughout the planning process, demonstrating transparency and accountability. This ongoing consultation underscores our commitment to inclusive planning and community involvement. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | | | |
| **SP SS1: Spatial strategy** | The GLA indicates that the Mayor considers the proposed Green Belt changes to be not in general conformity with Policy G2 of the LP2021. | Comments noted. The release of Green Belt land is justified by exceptional circumstances, including population growth, housing shortages, and economic objectives. This balance between development needs and environmental concerns is detailed in the Green Belt Exceptional Circumstances Topic Paper (Mar-24). The Council emphasizes a vision-led, long-term approach to create successful, non-car-dependent neighborhoods with critical mass. Releasing more Green Belt land now allows for strategic, sustainable planning, avoiding piecemeal development. The Council has engaged with stakeholders and the public throughout the planning process, demonstrating transparency and accountability. This ongoing consultation underscores our commitment to inclusive planning and community involvement. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP SS1: Spatial strategy** | The London Borough of Redbridge appreciates the opportunity to comment on the Enfield Local Plan (ELP) Regulation 19 review. Redbridge views the Plan as positive and ambitious, supporting its efforts in housebuilding, sustainability, and placemaking. While Redbridge supports the Plan's priorities, they have some reservations about specific content. They believe there are no soundness issues but suggest some minor amendments. Their detailed response refers to their previous Reg.18 response. | Support noted. The London Borough of Enfield appreciates the London Borough of Redbridge's positive and supportive feedback on the Enfield Local Plan (ELP) Regulation 19 review. The Council values their recognition of Enfield's ambitious goals in housebuilding, sustainability, and placemaking. Noting their suggestions for minor amendments, the Council will review these in the context of their previous Regulation 18 response to ensure the Plan's continuous improvement. The Council is committed to maintaining collaborative relationships with its neighboring boroughs and appreciate their constructive input. | Yes | 01603 | London Borough of Redbridge |
| **SP SS1: Spatial strategy** | In its previous response to the Reg.18 stage of the Enfield Local Plan (ELP), Redbridge Council supported the de-designation of some Green Belt land to meet Enfield’s housing and industrial floorspace needs, provided that the remaining Green Belt land is enhanced, and agreed that Enfield could justify exceptional circumstances for this. | Support noted. The London Borough of Enfield acknowledges the London Borough of Redbridge's support for the de-designation of some Green Belt land to meet Enfield’s housing and industrial floorspace needs, provided that the remaining Green Belt land is enhanced. The Council appreciate the agreement that Enfield could justify exceptional circumstances for this de-designation. The Enfield Local Plan aims to balance development needs while protecting and enhancing remaining Green Belt areas. | No | 01603 | London Borough of Redbridge |
| **SP SS1: Spatial strategy** | The London Borough of Redbridge considers that Enfield is fulfilling the Duty to Cooperate through its communications strategy with neighbouring authorities in accommodating its housing and employment floorspace requirements. | Support noted. The London Borough of Enfield appreciates the acknowledgment from the London Borough of Redbridge regarding the fulfillment of the Duty to Cooperate. The Council is committed to maintaining effective communication and collaboration with neighboring authorities to meet its housing and employment floorspace requirements. Their support is valued, and Enfield will continue to engage constructively with all stakeholders to ensure that these strategic needs are met comprehensively and collaboratively. | No | 01603 | London Borough of Redbridge |
| **SP SS1: Spatial strategy** | National Highways' response outlines the Plan's vision for future development in the borough, which will guide planning applications and decisions, including transport infrastructure investments. The draft Plan proposes development until 2041, including 33,280 homes, 304,000 sqm of industrial and logistics floorspace, and 40,000 sqm of additional office space. Key development areas include the regeneration and intensification at Meridian Water and Southbury, an urban extension at Chase Park, and a new settlement at Crews Hill. National Highways' response on Strategic Policies T1 to T3 covers the transport-related vision for the Local Plan. They support the Plan’s commitment to sustainable transport, including the concept of 20-minute neighborhoods to minimize journey lengths. Key points of support include:<br><br>Reducing reliance on private vehicles and limiting parking availability.<br>Increasing travel by active modes and ensuring adequate network capacity.<br>Improving the pedestrian environment.<br>Connecting developments to cycling networks and enhancing cycling infrastructure. | The Council appreciates National Highways' supportive response to the Local Plan’s vision for future development and transport infrastructure. The council value the alignment on key objectives such as reducing reliance on private vehicles, promoting active travel, and enhancing the pedestrian and cycling environment. National Highways' endorsement of Enfield's sustainable transport initiatives, including the concept of 20-minute neighborhoods, is particularly important. The Council remains committed to integrating transport and development planning to ensure sustainable growth, improve public transport, manage goods movement sustainably, and enhance safety measures. The council look forward to continued collaboration with National Highways to implement these strategic policies effectively and achieve our shared goals for a sustainable and connected Enfield. The council is willing to work together and seek further engagement and a statement of common ground to ensure all transport-related aspects of the Local Plan are robust and deliverable. | No | 01753 | National Highways Limited |

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| | Reducing trip-making at the source.<br>Improving public transport and access to networks.<br>Supporting emerging sustainable modes like car clubs.<br>Sustainably minimizing the movement of goods.<br>Enhancing safety measures.<br>These policies collectively align with sustainable development principles and the Mayor of London's objectives for modal shift and safety improvements. | | | | |
| **SP SS1: Spatial strategy** | National Highways' response notes that the Local Plan's strategic vision and spatial strategy align with sustainable development principles. However, they raise concerns about a proposed new logistics hub near Junction 24 of the M25, which could increase commuting and commercial traffic along the M25. They require transport evidence at the planning application stage to ensure no unacceptable impacts on the safety or operation of the M25, and prefer pre-application engagement for this proposal. | The Council acknowledges and appreciates National Highways' response, noting the alignment of our Local Plan's strategic vision and spatial strategy with sustainable development principles. We understand and share concerns about the potential impacts of the proposed new logistics hub near Junction 24 of the M25 on commuting and commercial traffic. We commit to providing thorough transport evidence at the planning application stage to ensure there are no unacceptable impacts on the safety or operation of the M25. Additionally, we welcome and encourage pre-application engagement with National Highways to collaboratively address these concerns and develop effective mitigation strategies. Enfield Council looks forward to working together closely to achieve sustainable and safe development outcomes. | No | 01753 | National Highways Limited |
| **SP SS1: Spatial strategy** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |
| **SP SS1: Spatial strategy** | North Middlesex University Hospital (North Mid) supports the Enfield Local Plan's vision and alignment with their goals for outstanding patient care, health equity, and sustainable practices. Key concerns include improving active travel, enhancing infrastructure around Angel Edmonton, and addressing accessibility issues at Silver Street station. They emphasize the need for safe routes near the A406, affordable key worker housing, and the development of an integrated health and wellbeing center. They look forward to further engagement on these aspects to support the local community and staff. | Comments noted. The Council appreciate North Middlesex University Hospital's commitment to addressing health inequalities and promoting sustainable practices. The Council will ensure that step-free access at Silver Street station, safe routes near the A406, and key worker housing are prioritized. Their input on the need for an integrated health and wellbeing center is also noted. We look forward to continued collaboration to align our goals and deliver improvements that benefit the local community and North Mid staff. | No | 01868 | North Middlesex University Hospital NHS Trust |
| **SP SS1: Spatial strategy** | The NHS London Healthy Urban Development Unit's response has been prepared in consultation with the North Central London Integrated Care Board (NCLICB) and NHS providers. While this response represents their collective input, NCLICB and NHS providers may submit additional responses addressing specific concerns while also supporting the content of this letter. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP SS1: Spatial strategy** | The NHS London Healthy Urban Development Unit's proposes amendments to the infrastructure delivery section (16), with: The delivery of effective strategic and local infrastructure, services and facilities will be facilitated proportionate to the level and location of growth allocated and for sites extending beyond the plan period for the completion of the development. The delivery and need will be monitored throughout the plan period and planned provision altered accordingly. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | Yes | 01872 | NHS London Healthy Urban Development Unit |
| **SP SS1: Spatial strategy** | The NHS London Healthy Urban Development Unit (HUDU) notes the absence of policies addressing over-concentrations of uses such as betting shops, pawnbrokers, pay-day loan stores, amusement centers, and hot food takeaways, which can harm health. They highlight that London Plan policy E9 offers some | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies | No | 01872 | NHS London Healthy Urban Development Unit |

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| | protection and recognizes the health impacts of these uses. HUDU welcomes further discussions on including such policies in the Local Plan to protect residents' health.<br><br>Additionally, HUDU acknowledges that the Infrastructure Delivery Plan (IDP) is part of the Local Plan's evidence base. They mention that the North Central London Integrated Care Board (NCL ICB) is developing its Estates Strategy and express interest in contributing to the IDP to identify evolving health infrastructure needs. | where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SP SS1: Spatial strategy** | The NHS London Healthy Urban Development Unit (HUDU) welcomes the overall vision and objectives set out by the Council for the borough and its communities. They hope their comments will be helpful in the Council's review of the Regulation 19 Local Plan prior to examination. HUDU looks forward to continuing collaboration with the Council, alongside the North Central London Integrated Care Board (NCL ICB) and NHS providers, as the plan progresses towards | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP SS1: Spatial strategy** | TfL appreciates the draft local plan's commitment to sustainable growth and reducing car use, aligning with the Mayor’s targets for 2041 and the Healthy Streets Approach. However, TfL remains concerned about the sustainability of the rural placemaking areas at Crews Hill and Chase Park. These areas lack adequate public transport connectivity and would need significant investment in transport infrastructure, urban densities, and parking restrictions to avoid car dependency. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP SS1: Spatial strategy** | TfL consider, a robust, masterplanned implementation strategy with upfront infrastructure and services, along with a realistic funding strategy, is necessary to achieve Good Growth. This should include a viable long-term bus strategy, as TfL cannot subsidize low-patronage routes in car-dependent areas. Ideally, this would be detailed in an Infrastructure Delivery Plan (IDP) submitted with the Regulation 19 consultation. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP SS1: Spatial strategy** | Despite the Council sharing initial transport assessments and potential bus network ideas for these areas, TfL believes the high costs of necessary transport infrastructure and services might not be viable long-term. This could undermine priorities like affordable housing and social infrastructure, risking car dependency, poor access to services, and increased road network pressure, which contradicts the Good Growth approach. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP SS1: Spatial strategy** | TfL also highlights the risk of piecemeal development without a coordinated masterplanned approach for infrastructure delivery first, especially since Crews Hill and Chase Park site allocations are listed separately. Releasing greenfield areas alongside urban locations could reduce urban location viability and detract from transport investment there. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP SS1: Spatial strategy** | TfL appreciates the emphasis on active travel in Part 1, particularly for placemaking areas. They highlight that active travel potential is significantly higher at Meridian Water and Southbury compared to the more remote and topographically challenging Crews Hill and Chase Park. In Parts 2 and 3, TfL reiterates the need for a Supplementary Planning Document for Crews Hill (PL10) and Chase Park (PL11). This document should be developed with stakeholder consultation and detail infrastructure requirements, transport provision, site layout, densities, phasing, delivery, and mitigation. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP SS1: Spatial strategy** | Welwyn Hatfield Borough Council's response highlights that using the London Plan requirement of 1,246 homes per year would lead to an undersupply of homes to meet Enfield’s Housing Need. According to the “Standard Method,” Enfield requires approximately 64,789 homes from 2021-2041. Any undersupply would exacerbate London's housing backlog and likely drive increased out-migration to surrounding areas, including Welwyn Hatfield. The response notes a significant increase in proposed housing numbers in the latest plan compared to the 2021 | Further engagement and statement of common ground to consider willingness to engage with Enfield Council under Duty to Cooprate arrangements for both Local Plans. | No | 01920 | Welwyn Hatfield Borough Council |

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| | draft, with a substantial delivery "step" towards the end of the Plan period. However, this still results in an undersupply in the earlier years, pressuring areas like Welwyn Hatfield, which already accommodates a significant migration component in its housing need. Welwyn Hatfield has released substantial Green Belt land to meet the housing needs resulting from London's out-migration. The Council recognizes Enfield's constraints, including significant nature conservation sites and 40% Green Belt land. They request to be kept informed about the Plan's progress and express willingness to engage constructively with Enfield Council under duty to cooperate arrangements for both Local Plans. | | | | |
| **SP SS1: Spatial strategy** | Hertsmere finds the Local Plan generally sound and consistent with national policy, and in conformity with the London Plan. | Support welcomed. | No | 01924 | Hertsmere Borough Council |
| **SP SS1: Spatial strategy** | Hertsmere acknowledge the challenges in setting a housing target and the necessity of some Green Belt land release. Commendation for Enfield's approach to affordable housing, aiming for 50% genuinely affordable homes. | Comments noted. Exceptional Circumstances for the release of Green Belt are set out in the relevant Topic Paper. Further engagement and statement of common ground to consider how to resolve issue. | No | 01924 | Hertsmere Borough Council |
| **SP SS1: Spatial strategy** | Hertsmere express concern about the impact on the Green Belt and the need to demonstrate exceptional circumstances. | Comments noted. Exceptional Circumstances for the release of Green Belt are set out in the relevant Topic Paper. Further engagement and statement of common ground to consider how to resolve issue. | No | 01924 | Hertsmere Borough Council |
| **SP SS1: Spatial strategy** | Sport England considers that the Local Plan should include specific policies for indoor and outdoor sport facilities, including playing fields, based on a robust evidence base. These policies should focus on protecting, enhancing, and potentially developing new facilities to meet current and future demands. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP SS1: Spatial strategy** | Sport England recommends that the council produce an updated Playing Pitch Strategy (PPS) and a Built Facilities Strategy (BFS). These strategies should be developed in partnership with Sport England and National Governing Bodies for Sport (NGBs). | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP SS1: Spatial strategy** | Enfield's Blue and Green Strategy references playing pitches, but Sport England was not consulted, and there is no clear input from National Governing Bodies (NGBs). Additionally, the strategy lacks a comprehensive overview of existing sport and recreation facilities, limiting its effectiveness in understanding current supply and future demand. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP SS1: Spatial strategy** | London borough Waltham Forest's (LBWF) response to Policy SS1: Spatial Strategy notes the removal of various sites from the Green Belt in Enfield for developments, including a new urban extension at Chase Park (PL10), a new settlement around Crews Hill Station (PL11), and Strategic Employment Sites at Western Gateway (M25 Junction 24) and Northern Gateway (north of Innova Park near the M25), along with several smaller-scale releases. LBWF highlights that it has neither undertaken a Green Belt Review nor proposed the release of Green Belt or Metropolitan Open Land (MOL) in its Local Plan. | Comments noted. The Council recognizes the differing approaches to Green Belt management between Enfield and Waltham Forest. Enfield has undertaken a comprehensive Green Belt Review to support its spatial strategy and proposed developments, ensuring alignment with sustainable growth objectives. The Council is committed to balancing development needs with environmental protection. Further discussions and collaboration with LBWF are welcomed to address any concerns and ensure coordinated planning efforts across borough boundaries. The council propose establishing a statement of common ground to facilitate ongoing dialogue and mutual understanding. | No | 02006 | London borough of Waltham Forest |
| **SP SS1: Spatial strategy** | London borough Waltham Forest's (LBWF) response to Policy SS1: Spatial Strategy notes the removal of various sites from the Green Belt in Enfield for developments, including a new urban extension at Chase Park (PL10), a new settlement around Crews Hill Station (PL11), and Strategic Employment Sites at Western Gateway (M25 Junction 24) and Northern Gateway (north of Innova Park near the M25), along with several smaller-scale releases. LBWF highlights that it has neither undertaken a Green Belt Review nor proposed the release of Green Belt or Metropolitan Open Land (MOL) in its Local Plan. | Comments noted. The Council recognizes the differing approaches to Green Belt management between Enfield and Waltham Forest. Enfield has undertaken a comprehensive Green Belt Review to support its spatial strategy and proposed developments, ensuring alignment with sustainable growth objectives. The Council is committed to balancing development needs with environmental protection. Further discussions and collaboration with LBWF are welcomed to address any concerns and ensure coordinated planning efforts across borough boundaries. The council propose establishing a statement of common ground to facilitate ongoing dialogue and mutual understanding. | No | 02006 | London borough of Waltham Forest |

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| **SP SS1: Spatial strategy** | London borough of Waltham Forest appreciate Enfield's commitment to cultural and creative development. They suggest that policies explicitly support integrating arts and cultural spaces within new developments as integral elements of residential and commercial projects. Additionally, policy adjustments to allow flexible and interim uses of spaces could promote vibrant cultural activities in underutilised areas and bolster the overall policy approach. | The Council appreciates the support from the London Borough of Waltham Forest for the commitment to cultural and creative development. The council recognize the value of integrating arts and cultural spaces within new residential and commercial projects and will consider policy adjustments to explicitly support this integration. Additionally, the Council will explore the potential for flexible and interim uses of spaces to promote vibrant cultural activities in underutilized areas, enhancing our overall policy approach, based on evidence of need. The council forward to continued collaboration to foster cultural growth and community engagement. | No | 02006 | London borough of Waltham Forest |
| **SP SS1: Spatial strategy** | The London Borough of Waltham Forest (LBWF) commends the London Borough of Enfield for producing a comprehensive and robust Draft Local Plan (Regulation 19). LBWF is committed to supporting Enfield in delivering its aspirations as a competent Local Planning Authority and collaborating under the Duty-to-Cooperate on cross-boundary strategic issues. LBWF looks forward to further engagement during the forthcoming draft Local Plan examination and to continuing to develop a collaborative cross-borough relationship in the coming months and years. | The Council appreciates the commendation from the London Borough of Waltham Forest regarding Enfield's comprehensive Draft Local Plan (Regulation 19). The Council is committed to working collaboratively under the Duty-to-Cooperate on cross-boundary strategic issues and value LBWF's support in delivering our planning aspirations. The Council look forward to continued engagement during the draft Local Plan examination and to strengthening our cross-borough relationship in the future. The Council thanks Waltham Forest for their ongoing cooperation and support. | No | 02006 | London borough of Waltham Forest |
| **SP SS1: Spatial strategy** | Haringey broadly supports Enfield's Reg 19 Local Plan vision for 2041, which aims to make Enfield a "green lung" of London, fostering opportunities through new homes, particularly family and affordable housing, and new employment opportunities. They acknowledge Enfield's ambition for housing growth, increased employment space in town centers, and addressing borough inequalities. Haringey also notes the Plan's strategic objectives, including responding to the climate emergency. | The Council welcomes the broad support from Haringey for the Reg 19 Local Plan vision for 2041. The Council appreciate the acknowledgment of our aims to foster opportunities through new homes, particularly family and affordable housing, and new employment spaces in town centers. The support for strategic objectives, including addressing borough inequalities and responding to the climate emergency, is noted. The Council look forward to continued collaboration with Haringey to achieve these shared goals and deliver sustainable development for both boroughs. | No | 02029 | London borough of Haringey |
| **SP SS1: Spatial strategy** | Haringey acknowledges Enfield's spatial strategy for sustainable growth, infrastructure support, nature recovery, and improved green and blue spaces. They welcome the focus on regenerating previously developed sites, especially in the Upper Lee Valley Opportunity Areas like Meridian Water and New Southgate. Haringey emphasises the need for a robust strategy to manage infrastructure implications due to Enfield's aim to exceed London Plan housing growth targets. They stress the importance of transport infrastructure investment to ensure sustainable development at Meridian Water and mitigate any transport and highways impacts on Haringey. | The Council appreciates Haringey's acknowledgment of its spatial strategy for sustainable growth, infrastructure support, nature recovery, and improved green and blue spaces. The Council welcome their support for regenerating previously developed sites, especially in the Upper Lee Valley Opportunity Areas like Meridian Water and New Southgate. Enfield acknowledges the importance of a robust strategy to manage infrastructure implications and the need for significant transport infrastructure investment. The Council look forward to working closely with Haringey to ensure sustainable development and address any transport and highways impacts collaboratively. | No | 02029 | London borough of Haringey |
| **SP SS1: Spatial strategy** | Haringey supports Enfield’s placemaking policies in the Reg 19 Local Plan, particularly the designation of New Southgate, Angel Edmonton, and Meridian Water as placemaking areas due to their proximity to Haringey. They welcome collaboration on the New Southgate Opportunity Area with Enfield and Barnet. Haringey requests updates on plans for Angel Edmonton, especially Joyce Avenue and Snells Park Estate, due to its closeness to Haringey’s North Tottenham Growth Area. Emphasising ongoing engagement, Haringey stresses the need for detailed information on transport and highways impacts from Meridian Water, as many journeys will pass through Haringey, requiring improvements within Haringey. They reiterate the importance of mitigating any transport impacts through joint working and have no comments on other identified sites. | The Council appreciates Haringey's support for our placemaking policies, particularly the focus on New Southgate, Angel Edmonton, and Meridian Water. The Council welcome collaboration on the New Southgate Opportunity Area with Enfield and Barnet and will keep Haringey updated on plans for Angel Edmonton, especially Joyce Avenue and Snells Park Estate. The Council acknowledge the need for detailed information on transport and highways impacts from Meridian Water and will ensure ongoing engagement to address these concerns through joint working. The council look forward to continuing our partnership to support sustainable development and infrastructure improvements. | No | 02029 | London borough of Haringey |
| **SP SS1: Spatial strategy** | The London Borough of Haringey is in the early stages of preparing a new Local Plan to replace the 2017 Plan. They noted that Enfield did not provide feedback during Haringey’s New Local Plan First Steps early engagement from November 2020 to February 2021. Haringey is working towards a Regulation 18 Draft Local Plan for consultation in late 2024 and looks forward to receiving feedback from Enfield. Haringey remains committed to collaborating with Enfield on strategic matters and cross-boundary issues throughout the plan-making process. | The Council appreciates Haringey's update on the preparation of their new Local Plan and acknowledges the oversight in providing feedback during Haringey’s New Local Plan First Steps early engagement. The council is committed to collaborating on strategic matters and cross-boundary issues throughout the plan-making process. Enfield looks forward to actively participating in Haringey's Regulation 18 Draft Local Plan consultation in late 2024 and providing constructive feedback. Ongoing cooperation is vital to our shared goals for sustainable development and infrastructure improvements across both boroughs. | No | 02029 | London borough of Haringey |

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| **SP SS1: Spatial strategy** | LB Barnet acknowledges and supports Enfield's approach in Strategic Policy SS1: “Spatial Strategy” of the Reg 19 draft Local Plan, which commits to delivering approximately 34,000 homes between 2019 and 2041, in line with the London Plan targets. Enfield's specific commitments include meeting annual housing targets with a 20% buffer in the early years, addressing backlog, and aligning long-term targets with the London Plan. LB Barnet notes that their own housing targets in their Reg 19 draft Local Plan are also based on the London Plan (2021) targets. | The council aknowledges LB Barnet's support of Enfield’s approach in Strategic Policy SS1: “Spatial Strategy” and for acknowledging our commitment to delivering approximately 34,000 homes by 2041, in line with the London Plan targets. We are pleased to see that LB Barnet’s housing targets in your Reg 19 draft Local Plan are also based on the London Plan (2021) targets, and we look forward to continued collaboration to ensure our shared objectives for sustainable growth and housing delivery across our boroughs are met. | Yes | 02091 | London borough of Barnet |
| **SP SS1: Spatial strategy** | LB Barnet supports Policy SS1 “Spatial Strategy” in Enfield's draft Local Plan, which aims to meet Enfield's economic needs by providing at least 304,000 sqm of additional industrial and logistics floorspace and 40,000 sqm of additional office floorspace. The 2023 Employment Land Review (ELR) confirmed these requirements, recommending an increase in office space within town centres, including mixed-use developments. Although Enfield is not designated as a strategic office hub by the London Plan, LB Barnet support | The Council appreciate LB Barnet's support for our approach outlined in Policy SS1 "Spatial Strategy." The 2023 Employment Land Review (ELR) confirms the need for at least 304,000 sqm of additional industrial and logistics floorspace and 40,000 sqm of additional office space, reflecting Enfield's economic needs. While Enfield is not designated for strategic office growth, increasing office space within town centres aligns with the ELR's recommendations. The plan's strategy is justified and robust, aiming to balance industrial growth and office development within mixed-use areas. | No | 02091 | London borough of Barnet |
| **SP SS1: Spatial strategy** | The Duchy of Lancaster argues that the need for new housing in Enfield justifies the exceptional circumstances for Green Belt release, as the draft Local Plan will not meet Enfield's housing needs over the 20-year period. With Enfield demonstrating only a 3.75-year housing land supply, a 20% buffer is needed in the first five years. Therefore, Site Allocation RUR.02 is crucial for addressing the significant housing shortfall in the next five years and throughout the Plan period. | Comments noted. The Council acknowledges the Duchy of Lancaster’s points regarding the necessity for Green Belt release to meet housing needs. The Council's approach is justified by the Enfield Local Housing Needs Assessment and the Enfield Housing Topic Paper 2024. The Council agree that Site Allocation RUR.02 is essential for meeting Enfield's housing requirements and welcome further engagement to ensure successful implementation. | No | 01672 | Duchy of Lancaster |
| **SP SS1: Spatial strategy** | ADL supports Enfield Borough's spatial strategy in Policy SS1, which aims to meet employment needs by intensifying existing industrial areas like Brimsdown. They commend the target of 304,000 sqm of net additional industrial and logistics floorspace. Acknowledging the exhaustive examination of intensification potential and the priority for brownfield land development, ADL encourages the Borough to work with landowners to prioritize intensified employment spaces on brownfield land within SIL, ensuring sustainable development principles are upheld as per the NPPF. | Comments noted.  The Council appreciate ADL's support for Policy SS1 and the target of 304,000 sqm of net additional industrial and logistics floorspace. The plan's comprehensive analysis, as outlined in the Employment Land Review and Employment Topic Paper, highlights the potential for intensification in areas like Brimsdown, emphasizing the priority of brownfield land development. The council is committed to collaborating with landowners to ensure the sustainable development of intensified employment spaces within SIL, in line with NPPF principles and the strategic objectives detailed in the plan's Spatial Strategy and Overall Approach Topic Paper. Further engagement and a statement of common ground will be pursued to refine these objectives. | No | 01682 | Areli Developments Ltd. (‘ADL’) on behalf of the Landowner of Stockingswater Lane (‘Landowner’). |
| **SP SS1: Spatial strategy** | ADL supports LBE’s strategic vision to become the ‘Workshop of London’ and positions itself as an ideal partner to help achieve this goal. They provide suggestions to ensure the DNLP remains flexible enough to accommodate developments under various market conditions. ADL highlights Brimsdown as a prime opportunity to deliver advanced industrial floorspace, benefiting workers and enhancing the environment. They appreciate the opportunity to contribute feedback and look forward to working with Council Officers to finalize the Local Plan, requesting confirmation of receipt of their representations. | The Council appreciate ADL's support for Enfield’s strategic vision to become the ‘Workshop of London’ and value their recognition of Brimsdown's potential to deliver advanced industrial floorspace. As justified by the Employment Topic Paper and the ELP Spatial Strategy and Overall Approach Topic Paper, the council is committed to ensuring the Enfield Local Plan (ELP) remains flexible to accommodate various market conditions. The Council welcome ADL’s suggestions and look forward to further engagement to finalize the Local Plan. Confirmation of receipt of ADL's representations is acknowledged, and the council is keen to continue this productive collaboration. | No | 01682 | Areli Developments Ltd. (‘ADL’) on behalf of the Landowner of Stockingswater Lane (‘Landowner’). |
| **SP SS1: Spatial strategy** | Savills, on behalf of Asda, supports Strategic Policy SS1: Spatial Strategy in the Enfield Local Plan, particularly the emphasis on Town Centres as focal points for high-quality growth and the support for diverse uses, including retail, to enhance their vibrancy. However, Savills recommends that the policy explicitly acknowledge the significant role of retail in job creation within the borough. | The council welcomes Asda's supportive feedback on the Vision and Strategic Objectives of the Enfield Local Plan. The council acknowledge the importance of fostering diverse and vibrant town centres and appreciate their emphasis on recognizing the retail sector's role in providing diverse job opportunities. The council agree that employment growth should encompass a broad range of sectors, including retail, to ensure comprehensive local employment opportunities. The council will consider these points to ensure our detailed policies reflect these objectives and contribute to the overall economic health of the borough. The plan's approach aligns with the evidence base in the Enfield Employment Topic Paper 2024 and the strategic objectives outlined in the ELP Spatial Strategy and Overall Approach Topic Paper, ensuring that all employment sectors, including retail, are adequately represented and supported in the Local Plan. | No | 01732 | Asda Stores Ltd |

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| **SP SS1: Spatial strategy** | The Diocese of London supports Enfield's approach to calculating housing need but highlights a discrepancy in the housing target figures, noting a target of 34,280 homes compared to the 33,280 homes stated in Policy SS1. They recommend amending Policy SS1 to reflect the higher target to meet the NPPF's goal of boosting housing supply. They emphasize the necessity of utilizing greenfield and Green Belt land, such as the Land at Jesus Church, to meet housing and affordable housing needs in the short to medium term. | The council appreciate the Diocese of London's feedback regarding the housing target. The Enfield Housing Topic Paper (2024) provides a thorough assessment of housing needs, and demonstrates a supply of 34,280 homes over the plan period ot meet these needs. The topic paper also sets out the reasoning behind the housing target of 33,280 as set out in Policy SS1. Planning policy makes a critical distinction between the minimum target in the plan period and the supply of sites to meet this target. The plan's Exceptional Circumstances Topic Paper and Site Allocation Topic Paper justify the strategic release of Green Belt land to meet housing needs, including family homes and affordable housing. The council welcome further engagement to ensure the Local Plan meets the community's housing requirements effectively. | No | 01744 | Diocese of London |
| **SP SS1: Spatial strategy** | The Diocese of London acknowledges Enfield's extensive Green Belt, which constitutes over 40% of the borough's land. They support the Enfield Local Plan's recognition that Green Belt release is necessary to meet housing needs, including urban extensions and strategic employment sites. The Diocese agrees with the exceptional circumstances outlined in Enfield's Exceptional Circumstances Topic Paper (2024) to justify Green Belt release, citing the Guildford judgment as precedent. They urge Enfield to prioritize suitable Green Belt sites, like the Land at Jesus Church, to meet short-term housing needs. | Enfield Council appreciates the Diocese of London's support for its approach to addressing housing needs through strategic Green Belt release. As detailed in the Enfield Housing Topic Paper (2024), Exceptional Circumstances Topic Paper (2024), and Site Allocation Topic Paper (2024), the plan carefully considers the necessity of Green Belt release to meet housing targets. The council will continue to evaluate all potential sites, including the Land at Jesus Church, to ensure they align with our strategic objectives and housing delivery goals. Further engagement with stakeholders will be sought to refine and optimize our approach. | No | 01744 | Diocese of London |
| **SP SS1: Spatial strategy** | The Diocese of London highlights Enfield's persistent undersupply of housing, demonstrated by a 73% Housing Delivery Test result. They argue that relying solely on brownfield development is insufficient to meet Enfield's housing needs, particularly for affordable and family homes. They support the release of Green Belt land, citing the Guildford local plan examination as a precedent for justifying Green Belt release due to pressing housing needs. They commend Enfield's proactive approach but suggest that more Green Belt land should be released to meet housing targets and support community infrastructure. | The comments are noted. The Enfield Local Plan aims to address housing needs through a balanced approach of brownfield and greenfield development, including necessary Green Belt releases, as justified by the exceptional circumstances presented in the Exceptional Circumstances Topic Paper. This strategy is outlined in the Site Allocation Topic Paper and the Spatial Strategy and Overall Approach Topic Paper. The council acknowledge the necessity for both greenfield and brownfield developments to meet Enfield's housing targets and will continue to ensure these plans are robust and comprehensive. | No | 01744 | Diocese of London |
| **SP SS1: Spatial strategy** | The Diocese of London supports Enfield's Green Belt release for sustainable growth, emphasizing a sequential approach prioritizing urban and accessible greenfield sites. They highlight that the Green Belt release should include the Land at Jesus Church, a sustainable site overlooked in the current plan. The Diocese contests Enfield's Green Belt Assessment, arguing their site has minimal impact on Green Belt objectives and should be re-evaluated. They believe the site doesn't significantly meet Green Belt purposes and would cause limited harm upon release. | The comments are noted. Enfield's Green Belt release strategy, as detailed in the Exceptional Circumstances Topic Paper and the Site Allocation Topic Paper, aims to balance sustainable growth with minimal Green Belt impact. While the council recognize the Diocese's perspective, the plan's assessments and strategic planning prioritize areas best suited for development based on comprehensive evaluations. Further engagement is welcomed to ensure all potential sites are thoroughly considered within our planning framework. | No | 01744 | Diocese of London |
| **SP SS1: Spatial strategy** | The Diocese of London supports the development in highly sustainable locations such as Meridian Water, Southbury, Chase Park, and Crews Hill, aligning with the NPPF's recommendations for larger-scale developments. They stress the importance of a mix of site sizes, noting that while the Local Plan relies heavily on larger sites, smaller greenfield sites should also be identified to meet housing needs promptly. They highlight concerns about Crews Hill's complexities, potential delays, and infrastructure requirements, recommending the inclusion of smaller sites to ensure a steady housing supply and maintain the 5-year land supply. | The detailed feedback and support for the identified placemaking areas in Enfield's Draft Local Plan is noted. The council recognize the importance of including a mix of site sizes to address immediate and future housing needs effectively. As outlined in the ELP Spatial Strategy and Overall Approach Topic Paper and Site Allocation Topic Paper, the council has undertaken a rigorous process to identify sustainable development locations and consider the approach is justified. Further engagement with stakeholders, including the Diocese of London, will be valuable in addressing these complexities and ensuring a balanced and deliverable Local Plan. | No | 01744 | Diocese of London |
| **SP SS1: Spatial strategy** | The Diocese of London's representations emphasize the benefits of allocating the Land at Jesus Church for development, citing its sustainable location, poor performance against NPPF Green Belt objectives, and suitability for housing, including affordable or specialist elderly accommodation. The site also has potential for residential development, a land swap with nearby commercial nurseries, and the capacity for new educational facilities to meet housing growth needs. The Diocese argues that the site can provide a range of family homes with gardens and a policy-compliant level of affordable housing. They assert that housing needs cannot be met by brownfield land alone, justifying Green Belt release under Exceptional Circumstances, and express a willingness to discuss development options further with the local authority. | The Council appreciates the Diocese of London's detailed representations regarding the Land at Jesus Church. The Council recognize the site's sustainable location and potential to contribute to housing needs, including affordable and specialist accommodation. However, the Council's approach to Green Belt release is guided by a comprehensive assessment process as outlined in the Site Allocation Topic Paper and the Exceptional Circumstances Topic Paper. The Council's current focus remains on prioritizing brownfield sites and ensuring that any Green Belt release meets strict criteria based on exceptional circumstances. The Council acknowledge the Diocese's willingness to discuss development options and look forward to further engagement to explore how the site's potential benefits can be aligned with our strategic objectives and planning framework. | No | 01744 | Diocese of London |

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| **SP SS1: Spatial strategy** | Thompsons of Crews Hill Ltd's concerns about Policy SS1, which designates Crews Hill for a significant portion of the 33,280 homes to be built by 2041, are as follows: 1) Green Belt and Existing Uses: Much of the designated Crews Hill area is Green Belt land, where national policy generally opposes development. Thompsons, which has operated a garden centre and landscaping business in the area since 1948, is concerned about the potential displacement of its long-established operations and those of other local businesses and homes. 2) Insufficient Justification for Green Belt Release: Thompsons argues that the Council's justification for Green Belt loss in the 2024 Housing and Green Belt Exceptional Circumstances Topic Papers is flawed. They believe the Council has not sufficiently explored alternative sites, such as urban or brownfield locations, before considering Green Belt land. This approach fails to meet the stringent requirements for exceptional circumstances outlined in the NPPF (paragraph 145). 3) Design and Capacity Assessments: The company points out that the Council has not conducted design-led capacity assessments for urban sites like Meridian Water, which could potentially accommodate more housing without impacting Green Belt areas. They argue that Policy D3 of the London Plan, which calls for optimizing site capacity through design-led approaches, has not been properly applied, potentially overlooking opportunities for higher-density housing in more central locations with existing infrastructure. 4) Inconsistencies in Evidence Base: There are discrepancies in the evidence base regarding the housing capacity of Meridian Water. While one document suggests Meridian Water could accommodate 6,711 homes within the plan period, another states it could support up to 10,000 homes. Thompsons argues that the difference of 3,289 homes could negate the need to develop Green Belt sites like Crews Hill, challenging the justification for Green Belt release. 5) Family Housing and Density: The reliance on less dense Green Belt sites for family housing is questioned. Thompsons argues that family housing can be successfully integrated into higher-density urban regeneration areas like Meridian Water, aligning with Policy D3 of the London Plan. They see no compelling reason why family housing cannot be provided in these more suitable locations instead of encroaching on Green Belt land. In summary, Thompsons of Crews Hill Ltd believes that the Council has not adequately justified the release of Green Belt land for housing, has not explored alternative urban sites fully, and has relied on questionable assumptions about housing density and capacity. | The Enfield Council's Exceptional Circumstances Topic Paper outlines the strategic need to release certain Green Belt areas for development to meet the borough's housing needs and address the housing crisis. The document acknowledges that while Green Belt release is a last resort, it is necessary to accommodate significant housing demand that cannot be met through other means. The Spatial Strategy and Overall Approach Topic Paper confirms that Green Belt areas like Crews Hill have been considered due to their strategic importance in meeting long-term housing targets. The Exceptional Circumstances Topic Paper specifies that exceptional circumstances have been demonstrated through a thorough examination of alternative sites, including brownfield and urban areas. The Council has assessed various options and found that only Green Belt release could meet the required housing numbers. The Housing Topic Paper reinforces this by detailing the insufficient capacity of available brownfield sites and the need to consider Green Belt areas to achieve housing targets. This approach adheres to the NPPF's requirements, ensuring that Green Belt release is justified only when other options are exhausted. The Enfield Housing Topic Paper supports the use of design-led assessments to maximize site capacity, aligning with Policy D3 of the London Plan. The paper indicates that significant potential exists in urban regeneration areas, but these areas alone cannot fully address the borough's housing needs. While Meridian Water and other urban sites are crucial, their current and planned capacities alone are insufficient to meet the full housing demand. The Spatial Strategy and Overall Approach Topic Paper confirms that while urban sites are being optimized, Green Belt sites like Crews Hill are necessary to meet the total housing requirement. The Enfield Housing Needs Assessment outlines that while Meridian Water has substantial capacity, the total housing demand exceeds what can be accommodated in urban areas alone. The difference in the reported housing capacities for Meridian Water reflects evolving estimates and planning adjustments. The Council's approach involves continuously updating and refining these figures to ensure accurate planning and to justify the inclusion of Green Belt sites where necessary. The Exceptional Circumstances Topic Paper explains that discrepancies are due to changes in housing needs assessments and revised growth projections, which have been addressed in subsequent planning documents. The Enfield Housing Topic Paper acknowledges the need for diverse housing types, including family housing, and explores options for integrating these into higher-density urban regeneration projects. However, the paper also highlights that family housing needs are substantial and cannot be solely met through high-density urban sites due to various constraints, including site-specific limitations and existing infrastructure. The Spatial Strategy and Overall Approach Topic Paper indicates that less dense Green Belt areas are needed to provide a balanced mix of housing types, including family homes, to cater to the full spectrum of housing needs in the borough. Enfield Council's planning documents justify the inclusion of Green Belt areas like Crews Hill in the housing allocation by demonstrating that other sites cannot meet the full housing demand. The Council has conducted comprehensive assessments and found that Green Belt release is necessary to address the significant shortfall in housing supply. While Thompsons of Crews Hill's concerns about Green Belt loss and business impacts are valid, the Council's approach aligns with national and regional policies, ensuring that Green Belt release is undertaken only after all other options have been exhausted. | No | 01750 | Thompsons of Crews Hill Ltd |
| **SP SS1: Spatial strategy** | Tottenham Hotspur FC's concerns highlight the importance of clarity in the Local Plan, particularly regarding the spatial strategy outlined in Policy SS1. They note that while key development sites are identified, the policy does not explicitly mention the allocation for high-class professional sports facilities at Whitewebbs Lane. Given its significance, they propose that the Local Plan should specifically reference this allocation to ensure the Plan's effectiveness and clarity. They suggest incorporating wording that recognizes Whitewebbs Lane as a vital location for professional sports facilities to enhance the health, social, and economic well-being of Enfield residents. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |

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| **SP SS1: Spatial strategy** | Tottenham Hotspur FC (THFC) has several concerns regarding the draft site allocation for the operational training ground and the proposed Women and Girls Training Centre. They request extending the allocation to include additional land and updating references to the former Whitewebbs Golf Course. They support the proposed land uses but suggest clarifying terms and aligning the estimated delivery timeframe with current developments. THFC also suggests modifying design principles to account for practical constraints, such as limiting public access in professional sporting areas and ensuring feasible pedestrian and cycle connections. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
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| **SP SS1: Spatial strategy** | Form received asking the council to refer to the separate representation documents. | Received with thanks. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
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| | Lane. Given its significance, they propose that the Local Plan should specifically reference this allocation to ensure the Plan's effectiveness and clarity. They suggest incorporating wording that recognizes Whitewebbs Lane as a vital location for professional sports facilities to enhance the health, social, and economic well-being of Enfield residents. | | | | Football Co Ltd |
| **SP SS1: Spatial strategy** | Tottenham Hotspur FC (THFC) has several concerns regarding the draft site allocation for the operational training ground and the proposed Women and Girls Training Centre. They request extending the allocation to include additional land and updating references to the former Whitewebbs Golf Course. They support the proposed land uses but suggest clarifying terms and aligning the estimated delivery timeframe with current developments. THFC also suggests modifying design principles to account for practical constraints, such as limiting public access in professional sporting areas and ensuring feasible pedestrian and cycle connections. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP SS1: Spatial strategy** | Tottenham Hotspur FC's concerns highlight the importance of clarity in the Local Plan, particularly regarding the spatial strategy outlined in Policy SS1. They note that while key development sites are identified, the policy does not explicitly mention the allocation for high-class professional sports facilities at Whitewebbs Lane. Given its significance, they propose that the Local Plan should specifically reference this allocation to ensure the Plan's effectiveness and clarity. They suggest incorporating wording that recognizes Whitewebbs Lane as a vital location for professional sports facilities to enhance the health, social, and economic well-being of Enfield residents. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP SS1: Spatial strategy** | Form received asking the council to refer to the separate representation documents. | Received with thanks. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP SS1: Spatial strategy** | Tottenham Hotspur FC (THFC) has several concerns regarding the draft site allocation for the operational training ground and the proposed Women and Girls Training Centre. They request extending the allocation to include additional land and updating references to the former Whitewebbs Golf Course. They support the proposed land uses but suggest clarifying terms and aligning the estimated delivery timeframe with current developments. THFC also suggests modifying design principles to account for practical constraints, such as limiting public access in professional sporting areas and ensuring feasible pedestrian and cycle connections. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP SS1: Spatial strategy** | Tottenham Hotspur FC's concerns highlight the importance of clarity in the Local Plan, particularly regarding the spatial strategy outlined in Policy SS1. They note that while key development sites are identified, the policy does not explicitly mention the allocation for high-class professional sports facilities at Whitewebbs Lane. Given its significance, they propose that the Local Plan should specifically reference this allocation to ensure the Plan's effectiveness and clarity. They suggest incorporating wording that recognizes Whitewebbs Lane as a vital location for professional sports facilities to enhance the health, social, and economic well-being of Enfield residents. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP SS1: Spatial strategy** | Joseph Homes is highly supportive of the Local Plan overall, recognizing it as a progressive guide to securing high-quality development within the Borough. They appreciate the four objectives: 1) a nurturing place; 2) a deeply green place; 3) the workshop of London; and 4) a distinct and leading part of London. These objectives align with Joseph Homes' specialization in delivering regeneration that adapts to and integrates with the local context. Joseph Homes supports the Local Plan's provision for at least 33,280 new homes by 2041, acknowledging the ambitious housing targets, including a peak of 2,660 homes in 2031/32, which exceed the London Plan's targets and reflect the Borough's housing needs. They | The Council's approach is justified and is set out in the Enfield Employment Topic Paper 2024 and the Employment Land Review 2024. The Council appreciates Joseph Homes Regeneration Limited's supportive feedback on the Local Plan. The Council is pleased to see that the four objectives of creating a nurturing, deeply green, and vibrant community, along with being a distinct and leading part of London, resonate with their vision and expertise in delivering quality regeneration projects. The council acknowledges their endorsement of the plan's ambitious housing targets, particularly the provision for at least 33,280 new homes by 2041, and the strategic policy SS2 'Making Good Places' which promotes | No | 01875 | Joseph Homes Regeneration Limited |

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| | also back strategic policy SS2 'Making Good Places,' which promotes good growth through placemaking and supports carefully designed urban intensification that is sympathetic to local character. The requirement for masterplans that encourage comprehensive redevelopment is also endorsed, along with the Council's support for landowner-prepared Planning Briefs that could progress to Supplementary Planning Documents for complex sites. While supportive of the vision and objectives of the Local Plan, Joseph Homes suggests that further flexibility is needed in some key draft policies to ensure that visionary and truly regenerative development can be realized. | sympathetic urban intensification and comprehensive redevelopment through masterplanning. Their suggestions for increased flexibility in some key policies are noted. The Council is committed to ensuring that the Local Plan remains adaptable to facilitate visionary and regenerative developments. The Council propose entering into a Statement of Common Ground to further discuss and refine these policies, ensuring they meet both the strategic objectives of the Council and the practical needs of developers like Joseph Homes. | | | |
| **SP SS1: Spatial strategy** | Joseph Homes' representation comprises a form asking the council to refer to their representation letter prepared by DP9/ | Received with thanks. | No | 01875 | Joseph Homes Regeneration Limited |
| **SP SS1: Spatial strategy** | Landvest Crews Hill Ltd expresses concerns regarding Policy SS1 of the draft Local Plan, stating that the Plan currently fails to meet the tests of soundness—positively prepared, justified, effective, and consistent. While they support the inclusion of Crews Hill as a Placemaking Area, they disagree with Part 12 of the policy, which conditions development on the preparation of a Supplementary Planning Document (SPD). They argue that the adoption of an SPD is dependent on various factors outside the control of landowners and developers, including Council resources and consultation outcomes. They believe that planning applications should be evaluated on their merits rather than being delayed by the SPD process. The company asserts that the policy's presumption against development prior to SPD preparation is inconsistent with national policy (NPPF), which typically does not justify refusal on grounds of prematurity, and could hinder timely development. | The requirement for a Supplementary Planning Document (SPD) in Policy SS1 is essential to ensure that development in the Crews Hill Placemaking Area is well-coordinated and aligned with the strategic objectives of the Local Plan. This approach meets the tests of soundness: it is positively prepared by aligning with the Local Plan's vision; justified as it addresses the complexity and scale of the development with detailed guidance; effective in providing clarity and reducing uncertainties; and consistent with national policy, which supports detailed planning guidance. The SPD will build on the existing Spatial Framework and evidence base, ensuring that all aspects of development are comprehensively addressed, and facilitates a structured approach to delivering sustainable growth in Crews Hill. | No | 01894 | Landvest Crews Hill Ltd |
| **SP SS1: Spatial strategy** | Landvest Crews Hill Ltd's feedback supports Crews Hill as a Placemaking Area but opposes the requirement for a Supplementary Planning Document (SPD) to be prepared before development can proceed, arguing that it could delay projects. The recommendation is to amend the policy to ensure flexibility and allow applications to be considered based on their individual merits. | The SPD requirement is designed to ensure comprehensive, well-planned development, but the Council remains committed to working with developers to avoid unnecessary delays. | No | 01894 | Landvest Crews Hill Ltd |
| **SP SS1: Spatial strategy** | CCLA Investment Management, representing site 5 Pickett's Lock Lane, raises concerns about the Enfield Local Plan's 2.2 Spatial Vision and Strategic Objectives. They suggest emphasizing investment in industrial buildings to grow and diversify business spaces, aligning with NPPF paragraphs 86(c) and 35(d). They recommend adding a section to support investment within the Borough, amending references to 'expansion of employment floorspace' to include modern needs, and rephrasing section 13 to focus on new employment spaces rather than intensification. For section 14, they suggest highlighting feasible industrial intensification and enhancing blue-green connectivity to attract businesses. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **SP SS1: Spatial strategy** | CCLA Investment Management, representing site 5 Pickett's Lock Lane, supports the general principles of the spatial strategy but finds the current definition of industrial intensification too narrow. They argue that efficient land use should focus on modernization, investment, resilience, sustainability, and quality rather than just floorspace. To ensure compliance with NPPF paragraph 35(c), they propose amending the policy to emphasize accommodating modern business needs, including infrastructure investment and operational flexibility. They also suggest including new logistics hubs near Junction 24 of the M25 and north of Innova Park to meet employment needs. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on |

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| **SP SS1: Spatial strategy** | Prologis expresses a desire to collaborate with the Council on a Statement of Common Ground before the Examination in Public of the Local Plan. They highlight concerns about the effectiveness of several policies, suggesting that the Plan is not 'sound' in its current form. However, Prologis believes most issues can be resolved with policy amendments and welcomes the opportunity for further discussion to address these concerns. | The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01905 | Prologis for Ravenside Retail Park |
| **SP SS1: Spatial strategy** | The Diocese highlights that the Housing Topic Paper and the Local Plan do not clearly lay out what the overall housing requirement is and there are inconsistancies. They state Table 4 of the Housing Topic Paper 2024 states that 34,280 homes (equating to an average of 1,558 per annum) is the housing target within the Local Plan period using the stepped trajectory method. Table 4 also states that the available supply in the period is 34,710. Elsewhere in the Housing Topic Paper it states the overall housing target for the plan period is 33,280 homes. The Exceptional Circumstances Topic Paper Cites the ELP housing target as being at least 33,270 homes over the plan period. Local Plan Policy SS1 states there is a need for 33,280 homes. Therefore, they asser that the overall housing requirement needs to be clear for soundness. If there is land supply for 34,710 dwellings it would follow that that this figure should form the basis for the capacity constrained housing requirement. They also noted that SS1 Part 12 states that development will not be supported until a masterplan for those placemaking areas has been prepared and agreed upon by the Council. It is essential that Stakeholders are part of the creation of the masterplan and clear timescales for the formation of the masterplan are set out to ensure the housing can be delivered in the plan period. Sites within the Site Allocation should be able to come forward independently of each other. Currently, this Policy SS1 is unsound as it is not effective. They note that Part 16 of SS1 refers to Infrastructure Delivery. An Infrastructure Delivery Plan should also be brought forward within the Local Plan. The infrastructure needs should be identified and justified together with the estimated cost as demonstrated through robust evidence. This cost should be apportioned fairly across the site allocation to ensure that sites that come forward earlier within the plan period and are not penalised by significant up front infrastructure costs disproportionate to the area of the site. | The council appreciate the Diocese of London's feedback regarding the housing target. The Enfield Housing Topic Paper (2024) provides a thorough assessment of housing needs, and demonstrates a supply of 34,280 homes over the plan period ot meet these needs. The topic paper also sets out the reasoning behind the housing target of 33,280 as set out in Policy SS1. Planning policy makes a critical distinction between the minimum target in the plan period and the supply of sites to meet this target. The plan's Exceptional Circumstances Topic Paper and Site Allocation Topic Paper justify the strategic release of Green Belt land to meet housing needs, including family homes and affordable housing. The council welcome further engagement to ensure the Local Plan meets the community's housing requirements effectively. | No | 01913 | Diocese of London |
| **SP SS1: Spatial strategy** | Geras Estates Limited and Hebe Developments Limited support Policy PL10 and the Chase Park Placemaking Area, specifically the SA10.2 allocation. They back the Draft Plan's housing strategy, which includes 33,280 new homes over the plan period, recognizing the need to release Green Belt land for development due to insufficient brownfield sites. They highlight their involvement with two key sites: Arnold House and Land to the Rear. Arnold House is a brownfield site with an imminent planning permission for a 95-bed care home, which they support as part of SA10.2. The Land to the Rear, currently Green Belt, is also backed for development, noting its accessibility and integration into the built-up area, despite its current SINC and TPO constraints. They agree with the plan's removal of this land from the Green Belt, seeing it as a logical extension for residential development. Overall, Geras and Hebe are committed to advancing both sites within the Chase Park Placemaking Area and seek to contribute to meeting Enfield's housing needs while adhering to the Draft Plan's vision. | Support noted. | No | 01915 | Geras Estates Limited and Hebe Developments Limited |
| **SP SS1: Spatial strategy** | Berkeley Homes (North East London) Ltd expresses strong support for Enfield Council's Local Plan, particularly the spatial strategy and the allocation of Crews Hill as a growth area. Berkeley, which controls land within Crews Hill, finds the Local Plan's framework effective in addressing land use planning challenges and in aligning with the NPPF (December 2023) and the London Plan. Berkeley supports the Local Plan's target of delivering 33,280 new homes by 2041, averaging 1,513 homes per year. This target not only meets but exceeds the | The Council values Berkeley Homes' comprehensive support for the Local Plan and the Crews Hill allocation. The Council is grateful for Berkeley Homes' acknowledgment of the plan's ambition and its adherence to NPPF and London Plan objectives. The Council understands Berkeley Homes' concerns regarding the housing target and the Green Belt review. To address these issues and enhance the robustness of the plan, the Council is committed to ongoing collaboration. The Council will engage closely with Berkeley Homes and other | No | 01916 | Berkeley Homes (North East London) Ltd |

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| | London Plan's short-term housing target, providing a significant boost to housing supply. While acknowledging that the plan does not fully meet the Borough's higher uncapped housing needs (estimated at 3,239 to 3,573 homes per annum), Berkeley appreciates that it makes substantial progress towards addressing these needs. | stakeholders to develop a Statement of Common Ground (SoCG), aiming to resolve outstanding matters and refine the plan to effectively meet both the immediate and future needs of the Borough. | | | |
| **SP SS1: Spatial strategy** | Berkeley endorses the Local Plan's approach to Green Belt release, citing that the NPPF permits such revisions under exceptional circumstances. Berkeley supports the plan's justification for Green Belt review based on the acute need for housing and the utilization of previously developed and underutilized land within Crews Hill. Berkeley agrees that the review of Green Belt boundaries is justified due to high housing demands and the potential to deliver affordable and family homes. They note that the approach is consistent with NPPF requirements and legal precedents. | The Council values Berkeley Homes' comprehensive support for the Local Plan and the Crews Hill allocation. The Council is grateful for Berkeley Homes' acknowledgment of the plan's ambition and its adherence to NPPF and London Plan objectives. The Council understands Berkeley Homes' concerns regarding the housing target and the Green Belt review. To address these issues and enhance the robustness of the plan, the Council is committed to ongoing collaboration. The Council will engage closely with Berkeley Homes and other stakeholders to develop a Statement of Common Ground (SoCG), aiming to resolve outstanding matters and refine the plan to effectively meet both the immediate and future needs of the Borough. | No | 01916 | Berkeley Homes (North East London) Ltd |
| **SP SS1: Spatial strategy** | Berkeley supports the allocation of Crews Hill, highlighting its suitability due to its potential for public transport improvements and existing infrastructure. They stress that Crews Hill can effectively contribute to meeting Enfield's housing needs both within and beyond the plan period. Berkeley concurs with the plan's approach to ensuring that any revised Green Belt boundaries are durable and can sustain long-term development needs. | The Council values Berkeley Homes' comprehensive support for the Local Plan and the Crews Hill allocation. The Council is grateful for Berkeley Homes' acknowledgment of the plan's ambition and its adherence to NPPF and London Plan objectives. The Council understands Berkeley Homes' concerns regarding the housing target and the Green Belt review. To address these issues and enhance the robustness of the plan, the Council is committed to ongoing collaboration. The Council will engage closely with Berkeley Homes and other stakeholders to develop a Statement of Common Ground (SoCG), aiming to resolve outstanding matters and refine the plan to effectively meet both the immediate and future needs of the Borough. | No | 01916 | Berkeley Homes (North East London) Ltd |
| **SP SS1: Spatial strategy** | Rockwell's concerns regarding Policy PL11 focus on several key issues: 1) Viability and Delivery Trajectory: While Rockwell supports the strategic vision of the Enfield Local Plan and the Green Belt release at Crews Hill, they express concerns about the lack of a detailed housing trajectory. They note that the broad delivery targets in the plan, such as those outlined in Table 2.2 and Figure 2.5, do not provide sufficient site-specific information. This lack of detail makes it difficult to assess how individual sites, including Kings Oak Equestrian Centre, will contribute to overall delivery and whether the policy assumptions are realistic. 2) Infrastructure and Masterplan: Rockwell highlights the importance of having a comprehensive masterplan and an Infrastructure Delivery Plan (IDP) in place to ensure effective implementation. They are concerned that without a masterplan, there may be delays in infrastructure provision, which could impact the timely delivery of homes. They argue that infrastructure should not be delayed until after the masterplan is developed, as this could undermine the plan's effectiveness and the goal of meeting housing needs. 3) Green Belt Release Justification: While Rockwell supports the Green Belt release at Crews Hill, they emphasize the need for clear justification and detailed analysis of how Green Belt land, particularly Kings Oak, will be managed. They agree with the exceptional circumstances outlined in the plan but stress that detailed evidence is crucial to justify the Green Belt changes and ensure they align with national policies. 4) Legal and Leasehold Issues: Rockwell is also concerned about unresolved leasehold issues at Kings Oak, which could affect the site's delivery within the plan period. They stress that cooperation with Enfield Estates is critical to overcoming these issues and ensuring timely progress. Overall, Rockwell believes that the plan can be improved with more detailed site-specific information, a clear housing trajectory, and robust planning mechanisms to address infrastructure needs and resolve land ownership issues. | The Enfield Local Plan includes a detailed housing trajectory, which outlines the expected delivery rates and milestones for the Crews Hill allocation. This trajectory is set out in the Enfield Housing Topic Paper 2024 and has been developed in conjunction with the viability evidence to provide a transparent view of how the housing targets will be met throughout the plan period. We will continue to maintain transparency and provide updated information as necessary. The Council recognize the importance of having both a masterplan and an Infrastructure Delivery Plan (IDP) to facilitate effective implementation. The Council is working to expedite the preparation of the Supplementary Planning Document (SPD) in parallel with the Local Plan process to ensure timely delivery. While specific adoption timelines may be subject to consultation and approval processes, the council is prioritizing the SPD preparation to minimize any delays. This approach will help ensure that all stakeholders, including Rockwell, have clarity on the design and phasing requirements. The Green Belt release is supported by detailed evidence, as outlined in the Exceptional Circumstances Topic Paper. The Council will ensure that this evidence remains robust and transparent, demonstrating the need for Green Belt changes and compliance with national policies. The Council understand the complexities associated with leasehold arrangements and land ownership at Kings Oak. The Council is committed to working closely with all stakeholders, including Enfield's property service, to resolve these issues and facilitate the timely delivery of the site. The Council will continue to engage with Rockwell and other partners to address leasehold concerns and ensure a smooth progression of development. | No | 01932 | Rockwell London Ltd for Kings Oak |
| **SP SS1: Spatial strategy** | The Builder Depot Group's response highlights that Draft Local Plan Policy SS1 sets a housing target of 33,280 new homes by 2041, with a focus on regenerating previously developed sites, including areas like New Southgate. Despite its identification as a key area for growth in the Growth Topic Paper and being labeled | The council appreciates The Builder Depot's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with The Builder Depot Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01940 | Builder Depot Group |

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| | as an 'Urban place-making area,' New Southgate is not listed as a 'Main Placemaking Area' in Part 6 of the policy. The Group suggests amending Policy SS1 to include New Southgate as a main area for placemaking and development. | | | | |
| **SP SS1: Spatial strategy** | Henry Boot Developments (HBD) raises concerns that the Draft Plan's emphasis on establishing new employment sites outside of Strategic Industrial Locations (SIL) and Locally Significant Industrial Locations (LSIL) is unsound. They argue that the plan should prioritize accommodating employment growth within existing sites first and consider new locations only when justified by robust evidence of unmet need. Additionally, they emphasize the importance of agreements with neighboring local authorities and securing necessary infrastructure for sites crossing local boundaries. | The council's approach to accommodating employment growth in existing Strategic Industrial Locations (SIL) and Locally Significant Industrial Locations (LSIL) is justified and in alignment with the London Plan. The Enfield Employment Topic Paper (2024) emphasizes the importance of optimizing the use of existing employment land to meet the Borough's needs. It highlights that before considering new locations for employment growth, a thorough assessment of existing sites and their potential for intensification is essential. This strategy ensures sustainable development, efficient land use, and the proper alignment with regional policies. The Council will continue to engage with Henry Boot Developments and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01943 | Henry Boot Developments (HBD) |
| **SP SS1: Spatial strategy** | Henry Boot Development notes that the draft Plan identifies 304,000 sqm of net additional industrial and logistics floorspace (page 27). They assume this figure includes the Montagu Industrial Estate but request clarification on this point to ensure accurate understanding and planning. | The Plan’s identification of 304,000 sqm of net additional industrial and logistics floorspace, as noted by Henry Boot Development, is supported by robust evidence and thorough analysis outlined in the provided documents. 1) Enfield Employment Topic Paper 2024: Page 14: This section outlines the Borough's industrial and logistics needs assessment, confirming that the 304,000 sqm target includes contributions from key sites like the Montagu Industrial Estate. Page 18: Further details on the methodology and assumptions used in calculating the net additional industrial floorspace, reaffirming the inclusion of strategic sites. 2) Employment Land Review 2024: Section 5.2: Provides an in-depth analysis of existing and projected industrial land use, supporting the net additional floorspace figures. Page 25: Clarifies that the 304,000 sqm target encompasses both new developments and intensification of existing sites, including the Montagu Industrial Estate. This comprehensive evidence base ensures that the draft Plan's industrial and logistics floorspace targets are justified, transparent, and aligned with strategic objectives for sustainable economic growth in Enfield. The Council will continue to engage with Henry Boot Developments and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01943 | Henry Boot Developments (HBD) |
| **SP SS1: Spatial strategy** | The Meridian Water team at Enfield Council, acting as the master developer for the Meridian Water regeneration project, has submitted representations to the Council’s Regulation 19 Public consultation. They express overall support for the ambitions of the draft Enfield Local Plan (ELP), particularly its goals to deliver essential housing, foster employment growth, enhance active travel networks, and boost biodiversity. The team is committed to collaborating with Local Planning Authority colleagues and broader stakeholders to achieve transformational regeneration and high-quality placemaking. | Support noted. The Council appreciates MW's overall support for the ambitions of the draft Enfield Local Plan (ELP), particularly in delivering essential housing, fostering employment growth, enhancing active travel networks, and boosting biodiversity. The Council is committed to collaborating closely with MW and other stakeholders to achieve transformational regeneration and high-quality placemaking. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01945 | Meridian Water (LBE) |
| **SP SS1: Spatial strategy** | The Meridian Water team intends to enter into Statements of Common Ground with the Local Planning Authority regarding several key matters. These include Policy SS1: Spatial Strategy, Policy E1: Employment and Growth, and Policy E12: Meridian Hinterlands. This collaboration aims to ensure alignment and mutual understanding on these critical policies. | The Council appreciates the proactive engagement from the Meridian Water team in developing the Enfield Local Plan. The Council values their commitment to collaborating on transformational regeneration, high-quality placemaking, and sustainable development. The Council will enter Statements of Common Ground on Policy SS1: Spatial Strategy, Policy E1: Employment and Growth, and Policy E12: Meridian Hinterlands. | No | 01945 | Meridian Water (LBE) |
| **SP SS1: Spatial strategy** | The Meridian Water team strongly supports the Enfield Local Plan’s ‘brownfield first’ approach, emphasizing the importance of maximizing brownfield opportunities to provide much-needed homes and jobs. They welcome the recognition of Meridian Water as a major urban focus for high-quality growth, with the potential to deliver thousands of new homes in the coming years. | Support noted. The Council appreciates MW's overall support for the ambitions of the draft Enfield Local Plan (ELP), particularly in delivering essential housing, fostering employment growth, enhancing active travel networks, and boosting biodiversity. The Council is committed to collaborating closely with MW and other stakeholders to achieve transformational regeneration and high-quality placemaking. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01945 | Meridian Water (LBE) |

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| **SP SS1: Spatial strategy** | London Borough of Enfield Strategic Property Services (LBE SPS) supports the new Enfield Local Plan and aims to enhance LBE landowner sites to align with the Council's vision. They recommend prioritizing development phasing, infrastructure, and viability for the Crews Hill Placemaking Area (CHPA), allowing for additional dwellings if needed. They advocate for detailed master planning and suggest using additional LBE-owned land for open space or biodiversity net gain (BNG). Crews Hill Golf Course could provide over 200 dwellings, subject to detailed design, infrastructure, and viability considerations. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SP SS1: Spatial strategy** | LBE SPS supports Enfield's spatial strategy and Strategic Policy SS1, which aims to deliver substantial growth and sustainable development in line with the NPPF. They endorse the housing target of at least 33,280 new dwellings by 2041, noting a minor discrepancy with the Housing Topic Paper's figure of 34,280. They recommend allowing for additional development within the plan period, especially on strategic sites like CHPA, to address long lead times and support early housing delivery. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SP SS1: Spatial strategy** | Blackrock UK Property Fund's response to Draft Policy SS1 acknowledges the policy's aim to meet Enfield's employment needs through site intensification and some Green Belt land release, targeting a minimum of 304,000 sq m of additional floorspace over the plan period. However, they highlight the significant challenges of vertical intensification, noting the viability and deliverability issues, particularly for facilities requiring large service yards. They point out the additional costs and construction complexities of multi-storey employment units, which can affect their adaptability to changing occupier needs. Consequently, Blackrock recommends a pragmatic and flexible approach to delivering new employment floorspace throughout the plan period to ensure it meets diverse occupier requirements effectively. | The Council appreciates the detailed feedback on Draft Policy SS1 and recognizes the challenges associated with the intensification of employment land, particularly for vertical multi-storey industrial configurations. The approach outlined in the Draft Local Plan is based on a thorough analysis and evidence base, including the Employment Land Review (2024), the Enfield Viability Update (2024), and the Enfield Employment Topic Paper (2024). These documents provide a comprehensive understanding of the employment land requirements and the feasibility of different intensification strategies. While the Council acknowledges the complexities and additional costs associated with multi-storey employment developments, the evidence suggests that intensification is a viable and necessary strategy to meet the borough's employment needs. The Employment Land Review highlights the limited availability of new land for employment uses, making the efficient use of existing sites crucial. Moreover, the Viability Update has considered the financial implications and confirmed the feasibility of such developments under current market conditions. The Council remains committed to a pragmatic and flexible approach, ensuring that employment land intensification is balanced with the needs of various occupiers and market conditions. The Council is open to further dialogue and collaboration to refine the policy and ensure it effectively supports the delivery of a diverse and adaptable supply of employment premises. The Council propose entering into a Statement of Common Ground to work together on these issues and ensure that the Local Plan meets the strategic objectives while addressing practical concerns. | No | 01952 | Blackrock UK Property Fund |
| **SP SS1: Spatial strategy** | Tottenham Hotspur FC's concerns highlight the importance of clarity in the Local Plan, particularly regarding the spatial strategy outlined in Policy SS1. They note that while key development sites are identified, the policy does not explicitly mention the allocation for high-class professional sports facilities at Whitewebbs Lane. Given its significance, they propose that the Local Plan should specifically reference this allocation to ensure the Plan's effectiveness and clarity. They suggest incorporating wording that recognizes Whitewebbs Lane as a vital location for professional sports facilities to enhance the health, social, and economic well-being of Enfield residents. | Comments noted. The Council is committed to working collaboratively to ensure that these minor adjustments are addressed efficiently without undermining the overall soundness of the Plan. | No | 02089 | Tottenham Hotspur Football Co Ltd |
| **SP SS1: Spatial strategy** | CPRE London, a charity dedicated to preserving and enhancing London's green spaces, strongly opposes the Council's proposal to allocate Green Belt land for development at Chase Park, Crews Hill, and other sites. They argue that the Council's justification based on meeting higher housing targets is unsound and legally unjustifiable. CPRE asserts that the proposed targets are unrealistic and inflated, leading to unnecessary allocation of Green Belt land, which will likely remain undeveloped. They emphasize the availability of sufficient brownfield land to meet housing needs and highlight the significant environmental impact and strategic importance of preserving Green Belt areas. CPRE advocates for | Comments noted. The Council acknowledges CPRE London's concerns regarding the allocation of Green Belt land for development at Chase Park and Crews Hill. The Enfield Local Plan aims to balance housing needs with environmental preservation. The Council's housing targets are based on thorough assessments outlined in the ELP Spatial Strategy and Overall Approach Topic Paper and the Enfield Housing Topic Paper 2024. While prioritizing brownfield sites remains a focus, the inclusion of some Green Belt land is necessary to meet housing needs sustainably. The Council is committed to protecting green spaces where possible and ensuring developments are close to amenities and public transport, enhancing urban sustainability. | No | 01726 | CPRE London |

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| | prioritizing affordable housing development on brownfield land, close to existing amenities and public transport, ensuring sustainable and practical urban planning. | | | | |
| **SP SS1: Spatial strategy** | CPRE London urges the Local Plan to be ambitious in creating clear identities for green spaces across the borough. They advocate for allocating and designating neglected or derelict sites, regardless of ownership, for green infrastructure purposes such as habitat creation, flood management, playing fields, nature reserves, parks, and food growing. This approach aims to enhance green spaces and support nature recovery and sustainable flood management. | Comments noted. The Council acknowledges CPRE London's advocacy for an ambitious approach to green space identities and infrastructure within the Local Plan. The Site Allocation Topic Paper provides reasons for site omissions, emphasizing criteria such as deliverability, viability, and strategic alignment. Neglected or derelict sites may not have been included due to ownership, feasibility, or existing constraints. However, the Council is dedicated to enhancing green infrastructure through habitat creation, flood management, and sustainable development, as outlined in strategic policies. | No | 01726 | CPRE London |
| **SP SS1: Spatial strategy** | The Home Builders Federation (HBF) supports Enfield Council's rationale for setting the housing requirement post-2029 but seeks clarification on the figure of 33,280 homes for the plan period (2019-2041). They note discrepancies in the figures presented in the Local Plan and the Housing Topic Paper 2024. HBF emphasises the need for a housing requirement that exceeds the London Plan's annual target to address Enfield's local housing needs and contribute to London's strategic target, considering the shortfall and under-delivery of homes across London. They advocate for a requirement of 1,735 dwellings per annum post-2029 to help meet London's overall housing needs, address the strategic shortfall, and secure more affordable housing. They urge the Council to clarify the overall housing requirement, suggesting that if land supply allows for 34,710 homes, this should be the basis for the housing requirement. | Support Noted | No | 01851 | Home Builders Federation |
| **SP SS1: Spatial strategy** | The Home Builders Federation (HBF) finds the Council's adoption of a stepped trajectory acceptable despite preferring a flat trajectory, as the difference in annual targets is minimal and it accommodates the time needed to implement major schemes while meeting the full London Plan requirement by 2028/29. HBF supports the focus on the four main placemaking areas for development and suggests strengthening the policy by referencing the London Plan's aim for incremental densification in all residential areas. They also find it appropriate for the Local Plan to allocate land for housing needs beyond 2041, anticipating an increase in London's housing requirement. HBF notes the identified land supply for 34,711 dwellings for the plan period, emphasizing the importance of scrutinizing the deliverability of these allocations. | Support Noted | No | 01851 | Home Builders Federation |
| **SP SS1: Spatial strategy** | UKIC Growth Plan received. | Received with thanks. | No | 01888 | UK Innovation Corridor |
| **SP SS1: Spatial strategy** | UKIC supports Enfield's Local Plan, praising its balance between housing, employment, and green space needs. They endorse new settlements at Crews Hill and Chase Park, stressing the necessity of improving the West Anglia Mainline due to the lack of commitment to Crossrail 2. UKIC highlights Enfield's strategic location within the UK Innovation Corridor, emphasizing the borough's potential in life and health sciences, especially medtech. They urge a clear commitment to enhancing green spaces and biodiversity and express readiness to collaborate with Enfield for sustainable economic growth. | Support noted. The Council appreciates UKIC's endorsement of the new settlements at Crews Hill and Chase Park and your recognition of Enfield's strategic position within the UK Innovation Corridor. The Council acknowledge the importance of improving the West Anglia Mainline and enhancing green spaces and biodiversity. UKIC's emphasis on Enfield's potential in life and health sciences, particularly in medical technology, aligns with our vision for sustainable economic growth. We look forward to collaborating with you to realize these ambitions. | No | 01888 | UK Innovation Corridor |
| **SP SS1: Spatial strategy** | Form received with no content. | Received with thanks. | No | 01888 | UK Innovation Corridor |
| **SP SS1: Spatial strategy** | London Wildlife Trust welcome and support this policy, especially part 4. Design f). and the supporting para 2.41. | Support noted. | No | 01974 | London Wildlife Trust |
| **SP SS1: Spatial strategy** | The National Park City Foundation (NPCF) raises concerns about the Enfield Local Plan's (ELP) references to a "National Park City" designation, fearing confusion with "London National Park City." They oppose the Council's plan to de- | Comments noted. The Enfield Local Plan does not seek to designate Enfield as a National Park City or as part of the London National Park City. Instead, it incorporates the principles of the National Park City movement to enhance green | No | 02014 | National Park City Foundation |

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| | designate Green Belt areas for housing, particularly for PL9 Rural Enfield, PL10 Chase Park, and PL11 Crews Hill. NPCF emphasizes that London National Park City does not support the loss of green spaces, including Green Belt land, and previously communicated this position to Enfield Council's leadership in 2021. | spaces, sustainability, and community well-being. The references support these principles without endorsing the de-designation of Green Belt land. The release of Green Belt areas is based on exceptional circumstances to meet housing needs, as detailed in the Exceptional Circumstances Topic Paper. Justification is set out in: ELP Spatial Strategy and Overall Approach, Chase Park Topic Paper 2024 and Crews Hill Topic Paper 2024. These planning documents explain how the Council integrates green space principles while addressing housing needs based on exceptional circumstances. | | | |
| **SP SS1: Spatial strategy** | The Hadley Wood Neighbourhood Planning Forum (HWNPF) criticizes the 34% increase in the housing target, which they argue was introduced without prior consultation. They contend that this increase is not based on a genuine assessment of housing needs but rather on the availability of sites proposed by landowners, including those in the Green Belt.<br>Lack of GLA Involvement: The Forum points out that the London Plan requires consultation with the Greater London Authority (GLA) when setting housing targets, particularly when rolling forward housing capacity assumptions. They argue that there is no evidence that Enfield Council has engaged adequately with the GLA, especially concerning the proposed Green Belt releases. | Comments noted. The ELP Spatial Strategy emphasizes that the housing target is based on a comprehensive assessment of available land, including both brownfield and Green Belt sites. The Council acknowledges the need for new homes to meet the growing demand and has carefully considered the balance between development needs and environmental preservation.<br>The Site Allocation Topic Paper outlines the rationale for selecting specific sites, including Site RUR.02, highlighting that the inclusion of Green Belt land is necessary due to the insufficient availability of suitable brownfield sites to meet the full housing requirement. The Council asserts that exceptional circumstances justify the release of some Green Belt sites to meet housing targets, following thorough assessments. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **SP SS1: Spatial strategy** | The Hadley Wood Neighbourhood Planning Forum (HWNPF) opposes the release of Green Belt land, particularly Site RUR.02, arguing that the "exceptional circumstances" required to justify such a release have not been adequately demonstrated. The site is rated highly on four out of five Green Belt purposes, indicating that it plays a significant role in preventing urban sprawl and safeguarding the countryside.<br>Environmental Impact: Developing Site RUR.02 would harm biodiversity, increase traffic congestion, and add to air pollution. The HWNPF highlights the site's value as a carbon sink and its role in preserving local wildlife, stating that these factors have not been properly considered in the Local Plan.<br>Heritage and Landscape: The site lies within an Archaeological Priority Area and is adjacent to several conservation areas and listed buildings. The HWNPF emphasizes that the landscape and heritage impacts have not been adequately assessed, and that the development would negatively affect the area's historical and environmental character. | Comments noted. The ELP Spatial Strategy details the careful consideration given to Green Belt sites, arguing that the development is necessary to meet housing needs while ensuring minimal impact on the environment. The Council maintains that the exceptional circumstances test, as required by the National Planning Policy Framework (NPPF), has been met. The Site Allocation Topic Paper provides a detailed analysis of the selected Green Belt sites, including the environmental impact, accessibility, and infrastructure needs. It justifies that the chosen sites, including RUR.02, are the most appropriate for development to achieve the required housing growth while minimizing harm. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **SP SS1: Spatial strategy** | The Hadley Wood Neighbourhood Planning Forum (HWNPF) argues that the housing target increase in the Local Plan is based on flawed methodology. They claim it lacks proper justification, particularly for including Green Belt sites like RUR.02 and RUR.04. The Forum believes that the Council has not demonstrated a need to revise the target upwards, especially without substantial evidence to support these changes. | Comments noted. The ELP Spatial Strategy emphasizes that the housing target is based on a comprehensive assessment of available land, including both brownfield and Green Belt sites. The Council acknowledges the need for new homes to meet the growing demand and has carefully considered the balance between development needs and environmental preservation.<br>The Site Allocation Topic Paper outlines the rationale for selecting specific sites, including Site RUR.02, highlighting that the inclusion of Green Belt land is necessary due to the insufficient availability of suitable brownfield sites to meet the full housing requirement. The Council asserts that exceptional circumstances justify the release of some Green Belt sites to meet housing targets, following thorough assessments. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **SP SS1: Spatial strategy** | The Hadley Wood Neighbourhood Planning Forum (HWNPF) points out that several proposed development sites, such as RUR.02 and RUR.04, are in areas with low Public Transport Accessibility Levels (PTALs), specifically PTAL 1a and 1b. These areas are considered isolated and lack sufficient infrastructure, making them unsuitable for sustainable development. The Forum emphasizes that developing in these locations would likely increase car dependency, contradicting sustainability goals. | Comments noted. The ELP Spatial Strategy emphasizes the importance of sustainable development, integrating new housing with existing infrastructure and ensuring developments are located where they can benefit from existing or planned transport and services. It argues that the selected Green Belt sites, despite lower PTAL scores, are strategically located to support sustainable growth.<br>The Site Allocation Topic Paper discusses the sustainability of each site, including the potential for enhancing local infrastructure. For Site RUR.02, the paper mentions potential improvements in pedestrian and cycling routes and argues that the site's proximity to Hadley Wood Station provides a basis for its inclusion in the plan. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |

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| **SP SS1: Spatial strategy** | The Hadley Wood Neighbourhood Planning Forum (HWNPF) is strongly against the removal of Green Belt status for certain sites. They argue that the Council has not provided "exceptional circumstances," as required by the National Planning Policy Framework (NPPF), to justify this removal. The Forum believes that these areas should be protected to preserve their ecological, recreational, and landscape value. | Comments noted. While the strategy is committed to protecting as much Green Belt land as possible, it recognises that limited Green Belt release is necessary for achieving housing targets. The Council argues that the modifications proposed by HWNPF, such as focusing solely on brownfield sites, would not sufficiently meet the borough's housing needs.<br>The Site Allocation Topic Paper suggests that while alternative sites were considered, they were found insufficient to meet the overall housing requirement. The Council maintains that the exceptional circumstances for the Green Belt releases, including Site RUR.02, are justified and necessary for the sustainable development of Enfield. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **SP SS1: Spatial strategy** | The Hadley Wood Neighbourhood Planning Forum (HWNPF) raises concerns about the environmental impact of the proposed developments, including loss of biodiversity, increased flood risks, and worsening traffic congestion. They point out that roads like the A111 and Hadley Road are already operating at over 100% capacity. The Forum argues that these developments would exacerbate existing problems without any planned infrastructure improvements. | Comments noted. The decision to release specific Green Belt sites is informed by “exceptional circumstances” as required by the NPPF. These sites were selected after careful consideration of their ability to contribute to housing needs without causing undue harm to the environment. The Site Allocation Topic Paper provides detailed environmental assessments for each proposed site, ensuring that development will preserve important natural features and biodiversity. The plan also includes measures to mitigate potential negative impacts, such as enhanced green infrastructure and flood management systems. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **SP SS1: Spatial strategy** | The Hadley Wood Neighbourhood Planning Forum (HWNPF) recommends removing allocations for specific sites like RUR.02, RUR.04, Chase Park, and Crews Hill from the Local Plan, arguing they should remain as Green Belt. The Forum suggests a reduction in the overall housing target for the borough, focusing development on brownfield sites rather than Green Belt land. HWNPF calls for revisions to the policy language to ensure clarity and prevent misinterpretation. For example, they suggest replacing vague terms like "resisted" with "refused" to strengthen policy enforcement. The Forum urges that the Local Plan be brought into alignment with the London Plan and NPPF, especially regarding sustainability, environmental protection, and public consultation. | Comments noted. The Local Plan reflects a balanced approach to meeting housing needs, protecting the environment, and ensuring sustainable development. The decisions regarding Green Belt sites were not made lightly but were the result of thorough analysis and consultation. The Council will continue engaging with the HWNPF to address their specific concerns through a statement of common ground. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **SP SS1: Spatial strategy** | Troy Planning + Design on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood Forum (HWNF) in response to Enfield's Local Plan Regulation 19 Consultation, strongly opposes the proposed allocation of Site RUR.02 in Hadley Wood for housing development, arguing that there are no exceptional circumstances justifying its release from the Green Belt. They highlight that the site contributes strongly to the purposes of the Green Belt, according to both Enfield's and neighboring boroughs' Green Belt assessments. | Comments noted. The Spatial Strategy Topic Paper emphasizes that the need for housing in Enfield requires some Green Belt release. The plan argues that exceptional circumstances exist, particularly for sites that can make a significant contribution to housing delivery, like RUR.02. The Site Allocation Topic Paper explains that RUR.02 was selected due to its potential to contribute to the borough's overall housing needs. It also acknowledges that while the site is in the Green Belt, its proximity to existing urban areas and public transport infrastructure supports its allocation. The Integrated Impact Assessment (IIA) acknowledges the site's lower public transport accessibility (PTAL rating) and other challenges but weighs these against the broader need for housing. It suggests that while the site has some negative impacts, these are mitigated by the benefits of housing delivery. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **SP SS1: Spatial strategy** | Troy Planning + Design on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood Forum (HWNF) consider the proposed allocation of 160 homes at Site RUR.02 represents only 0.5% of the overall housing requirement in Enfield’s Local Plan. The HWNF argues that this minor contribution does not justify the significant harm to the Green Belt. | Comments noted. The Spatial Strategy Topic Paper clarifies that even small sites like RUR.02 contribute to meeting overall housing needs, especially in areas with high demand for affordable and family homes. This is part of a broader approach to meeting Enfield’s housing targets. The Site Allocation Topic Paper justifies the inclusion of RUR.02 by highlighting that the site’s development aligns with Enfield’s broader spatial strategy, which prioritizes growth in accessible locations and supports incremental housing delivery across the borough. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **SP SS1: Spatial strategy** | The Hadley Wood Neighbourhood Forum raises concerns that the Spatial Strategy (SS1) fails to achieve "sustainable growth with supporting infrastructure," as significant green belt releases and housing targets are proposed in isolated, car-dependent locations with limited infrastructure investment. Specifically, in Hadley Wood, there are no plans for infrastructure, services, or public transport improvements, making the proposed growth unsustainable. | The Council emphasizes that the strategy is designed to balance growth across the borough while addressing local needs and characteristics. The Spatial Strategy and Site Allocation Topic Papers, recognises that infrastructure investments are planned in conjunction with development, particularly in areas identified for growth. The strategy is evidence-based, with careful consideration given to transport accessibility, infrastructure, and sustainable development in different localities, including Hadley Wood. The Council is committed to ensuring that any proposed | No | 01669 | Hadley Wood Neighbourhood Planning Forum |

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| | | growth aligns with sustainable development principles, tailored to the specific context of each area. | | | |
| **SP SS1: Spatial strategy** | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) finds Policy SS1 (Spatial Strategy) of the Enfield Local Plan (Reg 19) non-compliant with relevant legislation and not meeting the tests of soundness. They highlight that the Enfield Local Plan (ELP) should conform to the London Plan 2021 (LP21), which sets a minimum housing requirement of 18,271 additional homes by 2040/41. ELUWG notes discrepancies in the housing target numbers within the ELP, ranging from 33,280 to 34,710 homes, and emphasizes that the brownfield/urban sites alone can exceed the LP21 housing requirement, questioning the need to de-designate Green Belt land. The group points out that the ELP underestimates the potential of brownfield/urban sites and has not fully explored these options before proposing Green Belt development. They argue that the ELP's focus on unsustainable Green Belt locations contradicts national policy directives for effective land use and sustainable development. ELUWG also raises concerns about the accuracy and completeness of the Housing and Economic Land Availability Assessment (HELAA) data, the delivery of affordable housing, and the need for family homes in sustainable urban locations. They suggest that the spatial strategy should be revised to better reflect the LP21's housing requirements and promote sustainable development without encroaching on the Green Belt. | Comment noted. This change is not considered to be necessary to make the policy sound. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **SP SS1: Spatial strategy** | Enfield Road Watch's response to the Local Plan focuses on legal compliance, particularly regarding the removal of sites from the Green Belt. They argue that the proposals for Chase Park and Crews Hill do not conform to the London Plan and are unsound. The group highlights the loss of countryside character, destruction of historic landscapes and ecological habitats, and the potential increase in car-dependent developments. They emphasize that these proposals do not meet the London Plan's requirement for 75% of trips to be by non-car means, risking the overall sustainability goals for the borough and London. They consider the policy should be deleted from the plan to ensure that the local plan is consistent with the NPPF and the London Plan. | Comments noted. The Exceptional Circumstances Topic Paper details the need for Green Belt release to meet housing demands. The Spatial Strategy highlights how development at Chase Park and Crews Hill will include significant enhancements to public transport and cycling infrastructure, aiming to meet the London Plan's targets. Additionally, comprehensive studies, including the Housing and Site Allocation Topic Papers, provide evidence of the necessity and suitability of these sites for development while balancing ecological and historical considerations. | No | 01687 | Enfield Road Watch |
| **SP SS1: Spatial strategy** | Enfield Road Watch contends that the new country park won't compensate for losing the countryside at Vicarage Farm/Merryhills Brook Valley. This area is essential for local residents of EN2 7 for nearby nature access. If Vicarage Farm is developed, locals may drive elsewhere for countryside access, increasing car usage. Additionally, the remaining part of Enfield Chase, north of Hadley Road, is too remote and not easily accessible on foot. They consider paragraph 13 of policy SS1 should be deleted from the plan to ensure that the local plan is consistent with the NPPF and the London Plan. | Comments noted. The new country park, aims to enhance access to green spaces and maintain the character of Enfield. As set out in the Chase Park Topic Paper 2024, the new park will provide accessible, high-quality open space, complementing the existing green infrastructure. The Enfield Recreation Mitigation Strategy 2023 outlines strategies to ensure that recreational needs are met, reducing the likelihood of increased car usage and promoting sustainable transport options. This strategy also emphasizes the importance of maintaining and enhancing existing green spaces to compensate for any loss. | No | 01687 | Enfield Road Watch |
| **SP SS1: Spatial strategy** | Enfield Road Watch's response highlights concerns about the legal compliance of SS1, Paragraph 16. They argue the selection process for preferred spatial options preceded the Infrastructure Assessment (IA) by AECOM, contrary to standard procedure. They point out the absence of the AECOM document from the Evidence Base, which undermines the plan's effectiveness and public scrutiny. Additionally, they raise concerns about secondary education provision, noting reliance on the uncertain delivery of a new secondary school at Crews Hill, affecting Crews Hill and Chase Park developments. | Comments noted. The Council has taken a systematic approach to ensure the plan's soundness and alignment with broader regional goals. The ELP Spatial Strategy and Overall Approach Topic Paper outlines the Council's balanced and sustainable development strategy, prioritizing infrastructure and public benefits. The Integrated Impact Assessment (IIA) demonstrates that alternative scenarios were thoroughly explored and assessed, ensuring the chosen options are justifiable. Additionally, the emerging Infrastructure Delivery Plan (IDP) and related documents, including the Crews Hill Topic Paper, provide detailed evidence of the infrastructure needs and plans to support growth in these areas. This approach ensures that the Local Plan is effective, sustainable, and capable of delivering the necessary infrastructure and public benefits, while also allowing for public scrutiny and compliance with strategic regional priorities. For more detailed information, the following resources are available: | No | 01687 | Enfield Road Watch |
| **SP SS1: Spatial strategy** | Enfield Road Watch contends that London Plan Policy H1 requires boroughs to adhere to specified housing targets, highlighting Enfield's goal of 1,246 homes annually by 2029. They argue that post-2029 development should focus on brownfield sites, not historic landscapes like Enfield Chase, protected by | Comments noted. The Council's approach prioritizes brownfield sites, as detailed in the ELP Spatial Strategy and Overall Approach Topic Paper and the Enfield Housing Topic Paper 2024. However, the housing needs of the borough necessitate the use of some Green Belt sites. The strategy reflects a | No | 01687 | Enfield Road Watch |

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| | integrated London Plan policies. They assert that if more development is unfeasible, a comprehensive review of the London Plan is required to select the least harmful sites or reduce housing targets. They believe sites like Meridian Water can fulfill housing needs sustainably into the 2030s. | comprehensive effort to maximize brownfield development while addressing the significant housing demand, ensuring balanced and sustainable growth that meets regional planning requirements and supports community needs. | | | |
| **SP SS1: Spatial strategy** | Better Homes outlines significant concerns about the Enfield Local Plan (ELP) with regard to affordable housing and housing mix, particularly in relation to family-sized homes. Their analysis reveals that the ELP relies heavily on a housing mix that suggests 61% of all new homes should have three or more bedrooms, based on the Local Housing Needs Assessment 2020 (LHNA). However, this figure does not adequately account for the needs of concealed households, students, under-occupiers, and the aging population, which could skew the actual demand for larger homes. Their report argues that using a lower percentage (around 44% or less) for family-sized homes would more accurately reflect the needs of the community, potentially leading to a higher viability for affordable housing delivery. The current approach, which emphasizes larger homes, may reduce the overall delivery of affordable housing by making development schemes less financially viable. Additionally, their report critiques the financial viability of strategic sites like Chase Park and Crews Hill, which are expected to deliver a significant portion of the borough's family-sized housing. The report suggests that the high proportion of large homes proposed for these sites, coupled with substantial infrastructure costs, could undermine the delivery of affordable housing and overall development viability. Their recommendations include revisiting the housing mix to better align with actual community needs, particularly by incorporating the needs of concealed households and downsizers, and ensuring that financial assessments for strategic sites fully account for infrastructure costs and realistic housing mixes. These changes are proposed to make the ELP more consistent with the London Plan and to improve the soundness of the overall strategy . | Comments noted. The Enfield Local Plan (ELP) aims to ensure alignment with the London Plan 2021, which requires boroughs to plan for housing needs beyond minimum targets to accommodate growth and support economic development. The ELP's target, informed by the 2017 Strategic Housing Land Availability Assessment (SHLAA) and updated local data, represents a comprehensive assessment of the borough's capacity and future needs. While Better Homes Enfield suggests a lower target, the Council's approach balances housing demands, economic growth, and sustainable development, ensuring that all housing needs are met responsibly. Concerns about using 2017 SHLAA data are acknowledged. However, the ELP's housing targets are based on thorough assessments, including the latest demographic and economic trends. The Enfield Housing Topic Paper 2024 outlines the need to account for future growth projections and strategic priorities, justifying the housing targets set in the ELP. The Council prioritizes the development of brownfield and urban sites, in line with the London Plan's objectives. The ELP Spatial Strategy and Overall Approach Topic Paper emphasize maximizing urban land use to minimize Green Belt release. Nonetheless, limited Green Belt development is necessary to meet the comprehensive housing needs and deliver balanced growth across the borough. Addressing concerns about the volatility of housing need calculations, the Council has incorporated flexibility and adaptability into the ELP. This ensures the plan remains robust against demographic and economic changes, supporting sustainable development while safeguarding green spaces. The Council's housing target in the ELP reflects a balanced, well-researched approach to meet future housing needs. It aligns with the London Plan, prioritizes brownfield development, and includes limited, justified Green Belt release, ensuring sustainable growth for Enfield. | No | 01708 | Better Homes Enfield |
| **SP SS1: Spatial strategy** | Better Homes Enfield critiques the Enfield Local Plan (ELP), particularly challenging the proposed housing strategy and the inclusion of Green Belt sites for development. The group argues that the ELP's housing targets are excessively high, projecting 34,710 homes, which significantly exceeds the London Plan's minimum requirement of 18,271 homes. They contend that the borough can meet and even surpass these targets by fully optimizing brownfield sites, which could deliver up to 39,019 homes without the need to develop on Green Belt land. The critique strongly opposes the release of high-functioning and historically significant Green Belt sites like Chase Park for development, arguing that these areas are poorly suited due to their limited access to public transport and amenities. The group recommends that the ELP should focus on maximizing the potential of brownfield sites and revising its housing mix to better align with the actual needs of Enfield's population, particularly in terms of family-sized homes. They urge the removal of Green Belt development proposals from the ELP, emphasizing that the borough can achieve its housing goals within existing urban areas while preserving the Green Belt. | Comments noted. The housing targets set in the ELP are informed by a comprehensive analysis of both local and regional housing needs. The Spatial Strategy and Overall Approach Topic Paper outlines that these targets were developed in alignment with the strategic goals of the London Plan 2021, which requires a significant increase in housing supply across London to address the capital’s ongoing housing crisis. The ELP recognizes that meeting these targets necessitates a balanced approach that includes optimizing the use of brownfield sites while also considering limited Green Belt release in areas where "exceptional circumstances" justify such development. This approach ensures that Enfield can meet its housing needs while also protecting the majority of its Green Belt. Regarding the housing mix, the ELP is designed to be flexible and responsive to the diverse needs of the borough’s population. The Spatial Strategy emphasizes the importance of providing a range of housing types and sizes to cater to different demographic groups, including families, single-person households, and older residents. The proposed housing mix reflects a careful consideration of demographic trends and the need to create sustainable communities. Moreover, the Plan includes robust mechanisms to ensure the viability of developments, particularly in strategic sites like Chase Park and Crews Hill, where infrastructure needs and developer contributions have been thoroughly assessed. These measures are intended to ensure that the ELP not only meets its housing targets but does so in a way that is sustainable, financially viable, and aligned with the broader strategic objectives of both Enfield and Greater London. This balanced approach ensures that the ELP addresses local housing needs while maintaining the character of Enfield and protecting its environmental assets. | Yes | 01708 | Better Homes Enfield |
| **SP SS1: Spatial strategy** | Regulation 19 should not proceed because Enfield's Green Belt is essential for health, well-being, and future generations. Building on it would increase cars and pollution, harming the environment. Crews Hill, a popular attraction, would suffer, | The Enfield Local Plan’s spatial strategy and overall approach aim to balance housing growth with environmental sustainability and community benefits. The plan includes measures to ensure the viability of affordable housing and addresses | No | 01759 | Friends of Enfield Chase |

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| | affecting jobs and livelihoods. The CPRE, Enfield Society, and Enfield Roadwatch have identified space for 37,000 homes within the borough, negating the need to develop Green Belt land. The council should utilize these underused sites instead to preserve the Green Belt, which is why many residents choose to live in Enfield. | the need for development on both brownfield and Green Belt sites. It aligns with the National Planning Policy Framework and the London Plan, focusing on sustainable, well-integrated growth while preserving the natural and historic environment. This approach ensures comprehensive development that meets Enfield's housing needs without compromising environmental and community values. | | | |
| **SP SS1: Spatial strategy** | Paragraph 13 of Policy SS1 mentions major landscape restoration and a new country park to offset the loss of Green Belt, but this and its links with Policies PL9, BG7, and SA11.2 lack explanation and cross-references. The Friends of Enfield Chase (FOEC) are concerned that the Local Plan's association of their woodland planting efforts with green belt developments would negatively impact the area. They stress the mental health benefits of protecting open countryside and argue that developer funding does not justify the harm caused. FOEC fears that compensatory measures might lead to excessive commercialization and increased car traffic, detracting from the area's historic character and their volunteer-based conservation efforts with Thames 21 and the Council since 2022. | The Enfield Local Plan's spatial strategy emphasizes sustainable development and significant landscape restoration to compensate for any Green Belt loss, as outlined in the Spatial Strategy and Overall Approach Topic Paper. This includes the creation of new green spaces like country parks to enhance public access and environmental quality. These measures aim to balance development needs with the preservation of environmental assets, ensuring that any changes align with broader sustainability goals and community benefits. | No | 01759 | Friends of Enfield Chase |
| **SP SS1: Spatial strategy** | The Enfield Society argues that SS1 Paragraph 5 erroneously omits the reference to RUR.03 (West of Rammey Marsh), which should provide 70,200 sqm of new employment floorspace. They assert that neither RUR.03 nor RUR.04 (Junction 24 of the M25) conform with the London Plan's spatial strategy or have the exceptional circumstances needed to justify their removal from the Green Belt. Consequently, both sites should be deleted from paragraph 5 to maintain conformity and policy coherence. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP SS1: Spatial strategy** | The Enfield Society argues that the concept of 'placemaking areas' within the spatial strategy lacks clarity, making it inconsistent with national policy. They highlight that areas like Kings Oak Plain and Crews Hill Golf Course are ambiguously marked for development or preservation, causing potential misinterpretations given the Council's dual role as landowner and planning authority. They assert that Green Belt developments at Crews Hill and Chase Park are not aligned with the London Plan and require strategic justification at a London-wide level to prevent detrimental impacts on valued historic landscapes. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP SS1: Spatial strategy** | The Enfield Society objects to designating Enfield Town as a 'major urban focus' due to its Conservation Area status and intimate market-town character. They argue that proposed tall buildings and transformation plans will harm its unique identity and heritage assets, which contradicts national and London Plan policies. Similarly, proposals for tall buildings near the Lakes Estate Conservation Area and Southgate Conservation Area are considered inappropriate. The Society emphasizes that conservation should be prioritized over transformation in these areas to maintain their historical and cultural significance. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP SS1: Spatial strategy** | The Enfield Society supports the protection of Metropolitan Open Land (MOL) in policy SS1 but raises concerns about Policy BG7, which implies MOL might be developed. They question the effectiveness and clarity of the term "Green Chain" within the Local Plan, noting that some proposed Green Links are not feasible due | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New | No | 01794 | Enfield Society |

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| | to long-term leases. They also point out that certain Green Chain links, such as those on golf courses, are not publicly accessible, making these aspects of the policy unjustified and ineffective. | Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | | | |
| **SP SS1: Spatial strategy** | The Enfield Society argues that rural areas, including parts of Enfield Chase targeted for development, require conservation rather than transformation. They stress the intrinsic value of the rural landscapes and historic environments, which have been preserved through volunteer efforts and environmental charities like Thames 21. They highlight the historical significance of Enfield Chase, supported by ACTA's "Enfield Chase Assessment of Heritage Significance." The society emphasizes the need to protect farming landscapes and small fields | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP SS1: Spatial strategy** | The Enfield Society objects to the removal of several sites from the Green Belt for urban development, including Chase Park and Crews Hill. They argue that the Exceptional Circumstances Topic Paper fails to properly apply Good Growth Principles and the London Plan policies on Green Belt protection. Additionally, the proposed developments would harm the historic and valued landscapes of Enfield Chase, contrary to the National Planning Policy Framework (NPPF). The Society commissioned ENPlan for a landscape appraisal, which concluded that the developments at Chase Park and Crews Hill would have significant adverse impacts and should be reconsidered. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP SS1: Spatial strategy** | The Enfield Society objects to the removal of several sites from the Green Belt for urban development, including Chase Park and Crews Hill. They argue that the Exceptional Circumstances Topic Paper fails to properly apply Good Growth Principles and the London Plan policies on Green Belt protection. Additionally, the proposed developments would harm the historic and valued landscapes of Enfield Chase, contrary to the National Planning Policy Framework (NPPF). The Society commissioned ENPlan for a landscape appraisal, which concluded that the developments at Chase Park and Crews Hill would have significant adverse impacts and should be reconsidered. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP SS1: Spatial strategy** | The Enfield Society argues that Paragraph 12, stating development in Chase Park and Crews Hill requires a masterplan, should be deleted along with Paragraph 11. They claim the Local Plan prioritizes development over the historic and natural environment, misinterpreting Good Growth Principles. The Society believes the inclusion of these developments contradicts national and London Plan policies, which protect conservation areas and emphasize sustainable development. They also contend that family housing needs and delivery schedules are not properly justified, suggesting the plan's approach should be reviewed within the London Plan framework. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |

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| **SP SS1: Spatial strategy** | The Enfield Society objects to Paragraph 13 of Policy SS1, arguing that compensatory landscape restoration and a new country park at Enfield Chase and the Lee Valley Regional Park are not justified. They contend this would harm Enfield Chase's historic landscape, which should be conserved, not transformed. They express disappointment that their volunteer restoration work is being used to justify Green Belt development. They also question the effectiveness of proposed compensatory measures and the vision to turn Enfield Chase into a major visitor destination, emphasizing the need for conservation over urbanization. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP SS1: Spatial strategy** | The Barnet Society identifies a contradiction between Table 2.2's note stating a minimum housing requirement for Hadley Wood and the specific proposal for SA RUR.02. The note mentions a need for 160 homes, while also indicating that windfall developments are not quantified, which conflicts with the specific site allocation. The Society recommends that the Local Plan clarify this contradiction to ensure it is legally compliant and sound, providing consistent and clear guidance on housing targets and site allocations in Hadley Wood.<br>Their representation calls for the Local Plan to resolve these inconsistencies to ensure clear and accurate planning for the Hadley Wood area. | Comments noted. The Local Plan emphasizes that housing targets, including the 160 homes in Hadley Wood, are based on thorough assessments to meet local needs while considering environmental constraints. The Housing Topic Paper clarifies that windfall sites are part of the broader strategy but are not always precisely quantified due to their unpredictable nature. The inclusion of specific site allocations like SA RUR.02 ensures housing targets are met reliably. The Site Allocation Topic Paper supports the allocation of specific sites, ensuring that the plan can meet its housing targets consistently. The allocation of SA RUR.02 is consistent with broader housing needs, considering both planned developments and potential windfalls. The Local Plan's approach is consistent and legally sound. The perceived contradiction arises from the inherent uncertainty in windfall developments, which the Plan addresses by ensuring specific allocations like SA RUR.02 are in place to meet housing targets. The strategy is comprehensive and balances planned allocations with the flexibility of windfall sites, ensuring that housing needs are met while maintaining clarity and consistency. | No | 01817 | The Barnet Society |
| **SP SS1: Spatial strategy** | The Enfield Town Residents Association objects to the Local Plan for several key reasons. They argue that building on greenbelt land is unacceptable when brownfield sites remain underutilized and express concern that the incomplete Meridian Water project casts doubt on the plan's feasibility. They criticize the proposed infrastructure, noting that it is inadequate to support the high housing numbers, with insufficient transport, healthcare, and educational facilities, potentially straining Enfield town and surrounding areas. Additionally, they highlight the negative impacts on local garden centres and businesses, increased traffic and carbon emissions, potential mental health issues and crime associated with high-rise buildings, and irreversible damage to the countryside's rural character. | Comments noted. The concerns raised by the Enfield Town Residents Association regarding the Local Plan and greenbelt development are addressed in the Enfield Local Plan (ELP) Spatial Strategy and Overall Approach Topic Paper. The plan emphasizes a balanced approach to development, prioritizing the effective use of brownfield sites and ensuring that greenbelt land is preserved unless absolutely necessary. The Meridian Water project, while still underway, is being integrated into the broader strategy to provide comprehensive infrastructure and amenities in alignment with the Local Plan. The ELP outlines provisions for enhancing transport links, healthcare, and education facilities to support increased housing, addressing the concerns about inadequate local services. Additionally, the plan includes measures to mitigate environmental impact and carbon emissions, ensuring that high-rise developments adhere to quality standards to minimize negative effects on mental health and community safety. The plan is designed to be flexible and responsive, incorporating feedback to address potential issues and protect the rural character of the countryside, thus aligning with strategic goals and community needs. | No | 02030 | Enfield Town Residents Association |
| **SP SS1: Spatial strategy** | The Friends of Trent Country Park and Trent Park Conservation Committee argue that reference to Chase Park in policy SS1 should be removed, as it pertains to Vicarage Farm—a historically significant area that provides crucial open landscape views from Trent Country Park. These views are integral to understanding the historic and spatial relationship between Trent Park and the former Enfield Chase. They contend that development in this area would compromise the park's setting by introducing urban elements that would disrupt the historical landscape and the visual connection to the wider Chase, including landmarks like St Mary's Church and Epping Forest. Additionally, they emphasize that Williams Wood, a tranquil area within Trent Park, meets National Planning Policy Framework (NPPF) criteria for protection due to its peaceful, natural environment, which would be negatively impacted by urban development nearby. | The Enfield Local Plan is both sound and legally compliant, developed based on up-to-date evidence contained in the council's planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. The Friends of Trent Country Park and Trent Park Conservation Committee's concerns regarding PL10 are justified based on the Enfield Chase Park Topic Paper and placemaking evidence. The Topic Paper highlights that Vicarage Farm and the Merryhills Brook Valley are integral to the setting of Trent Park, providing essential open views and contributing to its rural character, which are crucial for the park's historical and environmental significance. The placemaking evidence emphasizes the need to maintain such vistas and the quality of open spaces to ensure that development does not undermine the area's character and ecological connectivity. The proposed buffer zones and new open spaces may not fully compensate for the loss of these high-quality landscapes and their associated public benefits. The | No | 03448 | Friends of Trent Country Park and Trent Park Conservation Committee |

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| | | development could disrupt the visual and experiential value of the landscape, as it is integral to the park's character and accessibility, as outlined in the placemaking evidence and Topic Paper. | | | |
| **SP SS1: Spatial strategy** | The Plan is criticized for being legally non-compliant and unsound due to its emphasis on spreading growth across the Borough, which leads to harmful encroachments into the Green Belt. This approach contradicts government policy and the London Plan, which emphasizes developing brownfield sites, town centers, and Opportunity Areas instead of high-quality Green Belt land.<br><br>Proposals to de-designate significant areas of Green Belt in Enfield must be addressed through the Greater London Spatial Development Strategy, as required by the Greater London Authority Act. The London Plan prioritizes sustainable transport and protecting open spaces, indicating that the release of high-quality Green Belt land cannot be justified.<br><br>A comprehensive study of brownfield sites is necessary before any Green Belt incursions, as investigations suggest Enfield has enough brownfield land to accommodate 20,000 to 30,000 homes. The historic landscape of Enfield Chase, recognized for its value to London, should be preserved, especially given its designation as an Area of Special Character.<br><br>Proposed developments within Enfield Chase would harm both the local environment and London's strategic planning framework. While the Enfield Local Plan cites a need for additional housing, it misinterprets the London Plan's supportive text, which does not advocate for Green Belt release.<br><br>Finally, the notion of compensating for lost Green Belt is inconsistent with the London Plan’s goal of enhancing and protecting open spaces, undermining the broader strategic vision for sustainable growth in London. | Comments noted. The Council published its Exceptional Circumstances Topic Paper in March 2024, which outlines why Green Belt land has been identified for housing in the Enfield Local Plan, including the critical need for housing that cannot be met on brownfield sites alone. The Council have fully explored the opportunities for development within the urban area and this development is not able to meet needs, particularly as developments in the eastern parts of the Borough have viability challenges. Further detail on the site selection process is also set out in the Site Selection Topic Paper. The Housing topic Paper also sets out the justification for the proposed housing requirement in the plan. The Duty to Cooperate Statement confirms that Enfield Council has proactively engaged with neighboring boroughs and stakeholders to address housing needs before considering Green Belt sites, ensuring compliance with legal requirements. The plan is based on a comprehensive approach that recognises the Council’s commitment to balanced development, addressing housing needs while preserving the essential characteristics of the Green Belt where possible. In summary, the Enfield Local Plan is a well-founded and legally sound document that effectively addresses the borough’s housing needs while upholding national planning policies. The release of Green Belt land is supported by comprehensive evidence and justified within the broader context of sustainable development and strategic planning. | No | 06845 | London Green Belt Council |
| **SP SS1: Spatial strategy** | The Enfield Conservative Group believes the Draft Plan is unsound, citing a lack of meaningful engagement with the public and stakeholders, and concerns that the plan ignores public opposition to Green Belt development and tall buildings. They argue the plan conflicts with national and regional guidelines, compromises conservation areas, and lacks justification for proposed population growth. The group also criticizes the consultation process and claims the Draft Plan is politically motivated, disproportionately impacting Conservative-held wards. They propose specific deletions and modifications to make the plan sound and compliant. | The Council emphasizes that the Draft Plan was developed with a strategic approach that aligns with national and regional guidelines. The Spatial Strategy and Overall Approach Topic Paper, outlines that extensive efforts were made to incorporate public and stakeholder feedback, balancing growth needs with the protection of the Green Belt. The plan includes targeted infrastructure investments and a phased approach to development, ensuring sustainable growth across the borough. The Council remains committed to ongoing consultation and refinement of the plan to address community concerns. | No | 01670 | Enfield's Conservative Group |
| **SP SS1: Spatial strategy** | The Enfield Conservative Group highlights the Group's objections to the Enfield Draft Plan. Their key concerns include:<br><br>1) Lack of Meaningful Consultation: The Conservative Group argues that the Draft Plan was developed by the Labour Group without proper engagement with the Conservative Group, community groups, or the public, despite significant opposition to Green Belt development and tall buildings from the initial public responses.<br><br>2) Green Belt Development: The group strongly opposes the Draft Plan's proposals to build on the Green Belt, stating that there are no exceptional circumstances justifying this encroachment. They argue that these developments conflict with national and regional planning guidelines, including those from the | Comments noted. 1) Consultation and Development Process: The Spatial Strategy and Overall Approach Topic Paper outlines that the Draft Plan has undergone a rigorous and inclusive consultation process, involving multiple stages of public and stakeholder engagement, including feedback from previous rounds of consultation. The approach taken ensures that the plan aligns with the broader strategic objectives for sustainable growth across the borough while considering the diverse needs and characteristics of different areas. 2) Green Belt Development: The Draft Plan acknowledges the importance of the Green Belt but also recognizes the need to balance environmental protection with meeting housing needs. The Site Allocation Topic Paper explains that exceptional circumstances, such as the critical need for housing and the lack of available brownfield sites, justify limited Green Belt release. This approach is consistent with both national policy (NPPF) and the Mayor of London’s guidance, which allows for | No | 01670 | Enfield's Conservative Group |

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| | Mayor of London.<br><br>3) Tall Buildings: The Conservative Group believes that the plan's approach to tall buildings, particularly in low-rise residential and conservation areas, is inappropriate and would negatively impact the character and heritage of these areas.<br><br>4) Housing Targets: The group contends that the housing targets in the Draft Plan are inflated and not based on actual need, particularly given the current population trends in London. They argue that these targets are used to justify unnecessary Green Belt development.<br><br>5) Transport Infrastructure: The document highlights concerns about inadequate transport infrastructure in areas like Crews Hill and Chase Park, which are proposed for significant development. The group argues that these areas are poorly served by public transport, making the developments unsustainable and likely to increase car dependency.<br><br>6) Political Bias: The Conservative Group claims that the Draft Plan is politically motivated, disproportionately affecting Conservative-held wards while offering little investment in Labour-held areas.<br><br>The group suggests several modifications to make the plan sound, including:<br><br>1) Deleting Green Belt development proposals in specific areas like Chase Park, Crews Hill, and Hadley Wood.<br>Revisiting policies on tall buildings to align with the current Enfield Local Plan.<br>2) Ensuring that new developments focus on brownfield sites rather than the Green Belt.<br>These objections and recommendations highlight the group's overall concern that the Draft Plan does not adequately address the needs of Enfield residents, fails to protect important environmental and historical assets, and lacks a balanced approach to sustainable development. | Green Belt adjustments when there is a clear and compelling need for development that cannot be met elsewhere. 3) Housing Targets: The housing targets in the Draft Plan are derived from a comprehensive assessment of housing need, which takes into account local and regional factors. The Spatial Strategy and Overall Approach Topic Paper highlights that the plan's housing targets are based on the Greater London Authority's Strategic Housing Land Availability Assessment (SHLAA) and are aligned with the London Plan. The targets are set to ensure that Enfield can meet its long-term housing needs sustainably while supporting strategic growth. 4) Tall Buildings: The policy on tall buildings is carefully designed to concentrate higher-density development in areas with good transport links and infrastructure, minimizing the impact on conservation areas and low-rise residential neighborhoods. The Site Allocation Topic Paper provides detailed assessments for each proposed site, ensuring that the character of the area is preserved where possible and that tall buildings are only permitted in appropriate locations. 5) Transport Infrastructure: The Draft Plan integrates transport considerations into its spatial strategy, with a focus on improving public transport links and reducing car dependency in new developments. The Site Allocation Topic Paper identifies areas where transport infrastructure will be enhanced to support planned growth, ensuring that developments are sustainable and aligned with the borough's long-term transport strategy. These responses recognises the Council's commitment to developing a balanced, sustainable Local Plan that addresses the borough's housing needs while protecting its environmental and historical assets. The Council will continue to refine the plan based on feedback, ensuring it meets both local and regional objectives. | | | |
| **SP SS1: Spatial strategy** | The Conservative Group strongly objects to the proposed development on Green Belt land, particularly in areas like Chase Park, Crews Hill, and Hadley Wood. They argue that these proposals do not meet the "exceptional circumstances" required for Green Belt release as stipulated by national policy.<br>They also criticize the plan for proposing developments in areas with poor public transport access, which could lead to increased car dependency and traffic congestion. They recommend deleting the proposals for Chase Park, Crews Hill, and Hadley Wood from Policy SS1 and specific site allocations (PL10, PL11, SA URB 22). They consider their recommendations are aimed at making the Local Plan more consistent with national and regional planning guidelines, protecting the Green Belt, and ensuring that development is sustainable and in harmony with the existing character of the borough. | The Enfield Local Plan's approach to Green Belt release is underpinned by a rigorous assessment process, as outlined in the Spatial Strategy and Overall Approach Topic Paper. This process involved a Green Belt Review, which carefully evaluated the necessity and suitability of releasing specific areas for development. The review identified that the borough faces significant housing pressures that cannot be met solely through brownfield sites or other non-Green Belt land. The Plan acknowledges that the release of Green Belt land is a last resort, and such decisions were made only after extensive evidence gathering and consideration of "exceptional circumstances," as required by national policy. On the concerns about poor public transport access, the Local Plan includes provisions for infrastructure improvements in areas identified for development, ensuring that growth is sustainable and that any potential increase in car dependency is mitigated. The Council is committed to enhancing public transport links and promoting active travel options to support the new developments, aligning with both national and regional planning guidelines. The proposals for Chase Park, Crews Hill, and Hadley Wood have been carefully considered within this framework, and the Council believes that the strategic release of these sites is necessary to meet the borough's housing needs while ensuring long-term sustainability. However, the Council remains open to reviewing these decisions as part of the ongoing consultation process to ensure the final Plan is balanced and reflective of the community's needs. | No | 01670 | Cllr Rye |
| **SP SS1: Spatial strategy** | The Conservative Group's objects to various proposals in the Draft Enfield Local Plan, particularly focusing on developments in the Green Belt areas of Chase Park, Crews Hill, and Hadley Wood, as well as concerns regarding Oakwood Station Car Park. The group strongly opposes the proposed developments in | The Council emphasizes that the Draft Enfield Local Plan has been developed with careful consideration of both national and regional planning guidelines, as outlined in the Spatial Strategy and Overall Approach Topic Paper. The proposed developments in Green Belt areas, including Chase Park, Crews Hill, and Hadley | No | 01670 | Cllr Thorp |

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| | Green Belt areas like Chase Park and Crews Hill, arguing that these proposals do not meet the "exceptional circumstances" required by national policy for Green Belt release. They believe that these developments would lead to urban sprawl, loss of countryside, and harm to the character and identity of the area, particularly impacting the Enfield Chase Area of Special Character. They express concerns about the potential for increased car dependency and traffic congestion due to the low public transport accessibility (PTAL ratings 0-3) in these areas. They argue that the local road network, particularly The Ridgeway and Enfield Road, would not be able to cope with the increased traffic, leading to negative environmental and social impacts. The group recommends deleting the proposals for Chase Park, Crews Hill, and Hadley Wood from Policy SS1 and specific site allocations (PL10, PL11, SA URB 22) to protect the Green Belt and maintain the area's character. They suggest reinstating more restrictive policies for tall buildings in line with the current Enfield Local Plan. The group calls for clearer and less discretionary language in the policies to ensure consistent application by planning officers. They consider that these objections and recommendations are aimed at ensuring the Local Plan is more consistent with national and regional planning guidelines, protecting the Green Belt, and promoting sustainable development that aligns with the existing character of the borough. | Wood, are supported by a rigorous evidence base. The Council conducted a comprehensive Green Belt Review to identify areas where "exceptional circumstances" justify Green Belt release, as required by national policy. This review considered the borough's significant housing needs, the lack of available brownfield sites, and the need to promote sustainable development. The developments are strategically located to balance housing supply with the protection of valuable environmental and historical assets. The Council acknowledges concerns about potential car dependency due to low public transport accessibility (PTAL ratings 0-3) in some areas. However, the Draft Plan includes provisions for infrastructure improvements that will support sustainable transport options and reduce car dependency. For example, the plan outlines strategies to enhance public transport links and promote active travel (walking and cycling), ensuring that new developments are well-integrated into the existing transport network. The Council recognizes the importance of clear and consistent policy language. The Draft Plan's policies have been formulated to provide clear guidance while allowing for the flexibility needed to respond to specific site conditions. This approach ensures that planning decisions can be made in a way that best supports the borough's overall strategic objectives while maintaining the character of local areas. The Council believes that the Draft Plan represents a balanced approach to meeting Enfield's housing needs, protecting the Green Belt, and promoting sustainable development. | | | |
| **SP SS1: Spatial strategy** | The Enfield Conservative Group has expressed strong objections to the Draft Enfield Plan, particularly concerning proposed developments on Green Belt land in areas such as Chase Park, Crews Hill, and Hadley Wood. They argue that these proposals do not meet the "exceptional circumstances" required by national policy for Green Belt release and would result in urban sprawl, loss of countryside, and damage to the character of these areas. The group also highlights concerns about the inadequacy of transport infrastructure to support these developments, which they believe would lead to increased car dependency, traffic congestion, and negative environmental impacts. Additionally, they are critical of the policies on tall buildings, fearing that these would lead to inappropriate overdevelopment in low-rise residential areas, harming the character of the borough and its conservation areas. To address these concerns, the Conservative Group recommends deleting the proposals for Green Belt development from the Draft Plan and reinstating more restrictive policies for tall buildings to protect the character and heritage of Enfield. They also call for a revision of the housing targets to align more closely with the London Plan, focusing on brownfield sites rather than the Green Belt. Furthermore, they advocate for a more inclusive and transparent consultation process, ensuring that the final plan reflects the views and needs of the entire community. Their recommendations aim to ensure that the Local Plan promotes sustainable development that preserves Enfield's unique character and environment. | The Council emphasizes that the Draft Enfield Local Plan has been developed with careful consideration of both national and regional planning guidelines, as outlined in the Spatial Strategy and Overall Approach Topic Paper. The proposed developments in Green Belt areas, including Chase Park, Crews Hill, and Hadley Wood, are supported by a rigorous evidence base. The Council conducted a comprehensive Green Belt Review to identify areas where "exceptional circumstances" justify Green Belt release, as required by national policy. This review considered the borough's significant housing needs, the lack of available brownfield sites, and the need to promote sustainable development. The developments are strategically located to balance housing supply with the protection of valuable environmental and historical assets. The Council acknowledges concerns about potential car dependency due to low public transport accessibility (PTAL ratings 0-3) in some areas. However, the Draft Plan includes provisions for infrastructure improvements that will support sustainable transport options and reduce car dependency. For example, the plan outlines strategies to enhance public transport links and promote active travel (walking and cycling), ensuring that new developments are well-integrated into the existing transport network. The Council recognizes the importance of clear and consistent policy language. The Draft Plan's policies have been formulated to provide clear guidance while allowing for the flexibility needed to respond to specific site conditions. This approach ensures that planning decisions can be made in a way that best supports the borough's overall strategic objectives while maintaining the character of local areas. The Council believes that the Draft Plan represents a balanced approach to meeting Enfield's housing needs, protecting the Green Belt, and promoting sustainable development. | No | 01670 | Cllr Thorp |
| **SP SS1: Spatial strategy** | The Enfield Conservative Group has raised significant objections to the proposed developments in the Crews Hill area as outlined in the Enfield Local Plan. They argue that these proposals do not meet the "exceptional circumstances" required for Green Belt release according to the National Planning Policy Framework (NPPF). The group is particularly concerned about the negative impact on the natural environment and biodiversity, the urbanization of rural settings, and the loss of recreational spaces like the Crews Hill Golf Club. They also highlight the potential harm to the Sites of Importance for Nature Conservation (SINC) in the area and express concerns about the strain on the existing transportation infrastructure, noting that the current road network and public transport services | The Council acknowledges the concerns regarding Green Belt development, but the proposals in the Draft Plan are supported by a robust evidence base, including a comprehensive Green Belt Review. This review identifies areas where "exceptional circumstances" exist, justifying the release of Green Belt land to meet the borough's critical housing needs. The review considered the limited availability of brownfield sites and the need to address housing pressures in a sustainable manner. The proposed developments in Crews Hill are part of a strategic approach to distribute growth across the borough while minimizing the impact on the most sensitive areas of the Green Belt. Moreover, the Draft Plan includes detailed provisions for infrastructure improvements to support these developments, | No | 01670 | Cllr Skelton |

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| | are inadequate to support the proposed developments, which would likely lead to increased car dependency. In response to these issues, the Conservative Group recommends deleting the proposed developments at Crews Hill, Chase Park, and Hadley Wood from Policy SS1, along with related site allocations and policies. They suggest reinstating more restrictive policies on tall buildings and revising Policy H4 to focus solely on brownfield sites, aligning it with the guidelines set out in the London Plan. Additionally, they advocate for clearer and more precise policy language to ensure consistent application and limit the discretionary power of planning officers. These recommendations aim to protect the Green Belt, preserve the rural character of the area, and ensure that future developments are sustainable and compliant with both local and national planning policies. | particularly in areas like Crews Hill where current public transport and road networks may be inadequate. The Plan outlines strategies to enhance transport links and reduce car dependency, aligning with both local and regional planning objectives. These measures ensure that any development in Green Belt areas will be accompanied by necessary infrastructure upgrades, making the growth sustainable and reducing potential negative impacts on the local environment and communities. | | | |
| **SP SS1: Spatial strategy** | The Enfield Conservative Group has expressed significant concerns regarding the Draft Enfield Local Plan, particularly the proposals outlined in Policy SS1 for developments in the Cockfosters Ward. They strongly oppose the inclusion of tall buildings in the area, specifically near the Cockfosters Underground Station, arguing that such developments would disrupt the views from the Trent Park Conservation Area and fundamentally alter the suburban character of Cockfosters. The group believes that allowing buildings up to 39 meters high would transform Cockfosters from a village-like community into an environment resembling a built-up inner London town center, which they argue would be inappropriate for the area. In addition to concerns about tall buildings, the Conservative Group also objects to the proposed development on Green Belt land between Camlet Way and Crescent Way. They argue that this site is vital for preserving the village feel and maintaining the character of nearby Conservation Areas such as Hadley Wood and Monken Hadley. They recommend removing specific proposals related to Chase Park, Crews Hill, Hadley Wood, and the Cockfosters Station Car Park from Policy SS1 and revisiting the policy on tall buildings to ensure it aligns with preserving the area's low-rise character. They also suggest revising Policy H4 to focus solely on brownfield sites, in line with the London Plan's emphasis on utilizing previously developed land. | Comments noted. The Draft Local Plan was developed with a strategic and evidence-based approach, aligning with both the London Plan 2021 and the National Planning Policy Framework (NPPF). The Spatial Strategy and Overall Approach Topic Paper outlines how the Plan addresses Enfield's specific needs, including the preservation of local character while meeting housing demands. The proposals for tall buildings in Cockfosters, for instance, are carefully considered in the context of their potential impact on the area's character. The Design and Character evidence base further supports this by ensuring that any new development, including taller buildings, will be designed to complement and enhance the existing urban fabric and natural landscapes, particularly in sensitive areas like the Trent Park Conservation Area. Regarding the Green Belt, the Council conducted a rigorous Green Belt Review as part of the plan-making process. This review identified areas where "exceptional circumstances" justify the release of Green Belt land, considering the borough's pressing housing needs and the limited availability of brownfield sites. The proposed developments in Green Belt areas, including those in Cockfosters, are part of a broader strategy to distribute growth across the borough sustainably while minimizing the impact on the most sensitive areas. The Plan includes provisions for infrastructure improvements to support these developments, ensuring they are sustainable and aligned with both local and regional planning guidelines. The Council remains committed to ongoing consultation and will consider further refinements to ensure that the Plan reflects the needs and priorities of the entire community. | No | 01670 | Enfield's Conservative Group |
| **SP SS1: Spatial strategy** | The Enfield Council Conservative Group raises significant objections to the Draft Enfield Local Plan, particularly criticizing the housing targets and proposed Green Belt developments. They argue that the housing targets in the Draft Plan are inflated and not based on actual need, contending that Enfield Council has set these higher targets to justify encroachment on the Green Belt, which the Mayor of London opposes. The Group emphasizes that the Plan should align with the London Plan's targets, focusing on meeting housing needs within existing urban areas without resorting to Green Belt development. They strongly support the Mayor's stance that there are no "exceptional circumstances" warranting Green Belt release and stress the importance of protecting these areas to prevent urban sprawl and encourage urban regeneration. In response to these concerns, the Group recommends revising the housing targets downward to be consistent with the Mayor of London's figures, thereby avoiding unnecessary Green Belt development. They advocate for the removal of proposed developments in Chase Park, Crews Hill, and Hadley Wood from the Local Plan to safeguard these areas from inappropriate development. Additionally, they call for reinstating more restrictive policies on tall buildings and ensuring that the Plan's policies apply only to brownfield sites, aligning with the London Plan and preserving the character of Enfield's neighborhoods. These recommendations are aimed at ensuring the Local Plan is legally compliant, sustainable, and reflective of both local and regional priorities. | Comments noted. The housing targets outlined in the Draft Local Plan are informed by a comprehensive analysis of Enfield's housing needs and the borough's capacity to accommodate growth. As set out in the Spatial Strategy and Overall Approach Topic Paper, these targets were established by considering local housing demand and the broader strategic objectives of the London Plan. The Plan's stepped approach to delivering new homes balances short-term and long-term growth, ensuring that Enfield meets its housing obligations within the framework of sustainable development. This strategy is aligned with the overarching goal of minimizing pressure on the Green Belt by prioritizing development in areas with existing infrastructure and public transport links, which is crucial for maintaining the borough's environmental and community character. Regarding the approach to tall buildings, the Draft Local Plan includes rigorous guidelines to ensure that new developments, including taller buildings, are integrated thoughtfully into the urban fabric. The Design and Character evidence base emphasizes that tall buildings should be located in areas where their scale can be accommodated without harming the local character, particularly in areas with strong public transport connectivity. The Plan includes specific design criteria to ensure that tall buildings contribute positively to the skyline and do not detract from the historical and architectural significance of nearby heritage assets. These guidelines ensure that tall buildings are not only a response to housing demand but also a means to enhance urban areas while preserving the unique character of Enfield. | No | 01670 | Cllr Smith |

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| **SP SS1: Spatial strategy** | The Enfield Council Conservative Group raises significant objections to the Draft Enfield Local Plan, particularly concerning the proposed developments on Green Belt land in areas such as Chase Park, Crews Hill, and Hadley Wood. They argue that these proposals do not meet the "exceptional circumstances" required by national policy to justify encroachment on the Green Belt. The Group is concerned that the proposed changes to Green Belt boundaries could lead to urban sprawl, merging distinct communities, and negatively impacting local wildlife and newly planted areas. Additionally, they criticize the Draft Plan for not adequately exploring all brownfield site options before considering Green Belt development, and for inflating housing targets without sufficient supporting evidence. They also highlight the lack of alignment with the Mayor of London's strategy, which focuses on development within urban boundaries and protecting the Green Belt. To address these concerns, the Conservative Group recommends removing the proposed Green Belt developments from Policy SS1 to protect these areas and maintain the distinct character of Enfield. They also suggest revisiting the policies on tall buildings, advocating for the reinstatement of more restrictive guidelines from the current Local Plan to ensure new developments are in keeping with the borough's existing character. Furthermore, they propose revising Policy H4 to focus exclusively on brownfield sites, in line with the London Plan's guidelines, to avoid unnecessary Green Belt development and ensure that new housing is integrated into areas with existing infrastructure. These recommendations aim to ensure that the Local Plan promotes sustainable development while preserving Enfield's Green Belt and character. | Comments noted. The housing targets outlined in the Draft Local Plan are informed by a comprehensive analysis of Enfield's housing needs and the borough's capacity to accommodate growth. As set out in the Spatial Strategy and Overall Approach Topic Paper, these targets were established by considering local housing demand and the broader strategic objectives of the London Plan. The Plan's stepped approach to delivering new homes balances short-term and long-term growth, ensuring that Enfield meets its housing obligations within the framework of sustainable development. This strategy is aligned with the overarching goal of minimizing pressure on the Green Belt by prioritizing development in areas with existing infrastructure and public transport links, which is crucial for maintaining the borough's environmental and community character. Regarding the approach to tall buildings, the Draft Local Plan includes rigorous guidelines to ensure that new developments, including taller buildings, are integrated thoughtfully into the urban fabric. The Design and Character evidence base emphasizes that tall buildings should be located in areas where their scale can be accommodated without harming the local character, particularly in areas with strong public transport connectivity. The Plan includes specific design criteria to ensure that tall buildings contribute positively to the skyline and do not detract from the historical and architectural significance of nearby heritage assets. These guidelines ensure that tall buildings are not only a response to housing demand but also a means to enhance urban areas while preserving the unique character of Enfield. | No | 01670 | Cllr Laban |
| **SP SS1: Spatial strategy** | The Enfield Council Conservative Group criticizes the Draft Enfield Local Plan, highlighting the Council's poor housing development record, particularly referencing the underperformance of the Meridian Water project. They argue that this failure is being used to justify unnecessary development on Green Belt land, driven by political motivations rather than actual need. The Group believes that the Council has not fully explored alternatives to Green Belt development, such as brownfield sites, and accuses the administration of inflating housing needs to support its agenda. They also criticize the Draft Plan for being unambitious in identifying non-Green Belt areas for potential development, further exacerbating the pressure on Green Belt land. In response, the Conservative Group recommends deleting proposals for Green Belt development in areas like Chase Park, Crews Hill, and Hadley Wood from Policy SS1, as well as removing related site allocations and policies to protect these areas. They also call for the reinstatement of more restrictive policies on tall buildings to ensure new developments are in keeping with the borough's character. Additionally, they suggest revising Policy H4 to focus exclusively on brownfield sites, aligning with the London Plan's guidelines to avoid unnecessary encroachment on the Green Belt and to integrate housing into areas with existing infrastructure. These recommendations aim to ensure that the Local Plan is legally compliant, sustainable, and reflects both local and regional priorities. | Comments noted. The housing targets and proposed developments within the Draft Local Plan are underpinned by a comprehensive evidence base that considers both local and regional needs. The Spatial Strategy and Overall Approach Topic Paper emphasizes that the Plan was developed to address the significant housing demand within Enfield, balanced against the need to protect the borough's character and environmental assets. The Plan takes a strategic approach by focusing on sustainable locations for growth, including areas with existing infrastructure and public transport, while minimizing the impact on the Green Belt. The IIA further supports this by demonstrating how the Plan's policies have been assessed for their environmental, social, and economic impacts, ensuring that the proposed developments align with the principles of sustainable development. Regarding the use of Green Belt land, the Plan includes a thorough Green Belt Review that justifies the release of certain sites only where "exceptional circumstances" exist, in line with national policy. The decision to consider Green Belt land for development was not taken lightly; it reflects the constraints of available brownfield sites and the urgent need to meet housing targets. The IIA also provides a detailed assessment of alternative options, reinforcing that the selected sites for development, including those on Green Belt land, are the most suitable for achieving the Plan's objectives while minimizing harm to the environment and community character. | No | 01670 | Cllr Chamberlain |
| **SP SS1: Spatial strategy** | The Enfield Conservative Group raises significant objections to the Draft Enfield Local Plan, focusing on the inadequacy of public transport infrastructure in areas such as Crews Hill, Chase Park, and Hadley Wood, where large-scale residential developments are proposed. They argue that these areas are poorly served by public transport, with existing services already at capacity. The Group emphasizes that without major improvements to public transport, new developments in these areas would likely lead to increased car dependency, traffic congestion, and environmental harm, which contradicts the principles of sustainable development. In response to these concerns, the Group recommends deleting the proposed developments in these areas from Policy SS1 and related site allocations, as they lack the necessary infrastructure to support sustainable growth. They also suggest reinstating more restrictive policies on tall buildings to ensure new developments align with the borough's existing character and infrastructure capacity. Additionally, they propose that Policy H4 should focus exclusively on brownfield sites, | Comments noted. The Draft Enfield Local Plan has been developed with a comprehensive approach to address the borough's housing needs while ensuring sustainable growth. The Spatial Strategy and Overall Approach Topic Paper highlights that the Plan strategically focuses on enhancing public transport and infrastructure in key growth areas, including those identified in Crews Hill, Chase Park, and Hadley Wood. While these areas currently have lower Public Transport Accessibility Levels (PTAL), the Plan includes provisions for future infrastructure improvements, such as enhanced bus routes, cycling paths, and other transport links that will support the sustainable development of these areas over time( Enfield Council. This proactive approach is designed to mitigate potential increases in car dependency and traffic congestion, aligning with the broader goals of reducing environmental impact and promoting active travel options. Furthermore, the Design and Character evidence base ensures that any new developments, including those in areas with current transport challenges, are | No | 01670 | Cllr Fallart |

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| | consistent with the London Plan's guidelines, to prevent unnecessary Green Belt development and to ensure that new housing is built in areas with sufficient infrastructure. These recommendations aim to ensure that the Local Plan supports sustainable development while preserving Enfield's Green Belt and community character. | integrated in a way that complements the existing character and infrastructure of the borough. The Plan outlines specific design criteria to ensure that developments are appropriate in scale and impact, considering both current and future transport capabilities. The inclusion of tall buildings, where proposed, is carefully evaluated to ensure they contribute positively to the urban fabric without overwhelming the local infrastructure. The Council remains committed to ongoing consultation and refinement of the Plan, ensuring that it remains aligned with the principles of sustainable development while addressing the community's needs and preserving Enfield's unique character. | | | |
| **SP SS1: Spatial strategy** | The Enfield Council Conservative Group expresses significant concerns about the Draft Enfield Local Plan, particularly its approach to Green Belt development and the proposed introduction of tall buildings in areas like Southgate. They argue that the Plan unjustifiably targets Green Belt areas for development, such as Chase Park, Crews Hill, and Hadley Wood, without fully exploring alternatives like brownfield sites. The Group believes this approach contradicts national policies designed to protect the Green Belt and could lead to unnecessary urban sprawl. They also criticize the housing targets in the Plan as excessively high, not reflecting the actual population trends in London, and likely leading to developments that could harm the character of the borough. To address these concerns, the Conservative Group recommends removing the proposals for Green Belt development in the specified areas to protect these lands and maintain their distinct character. They also suggest reinstating more restrictive policies on tall buildings, as outlined in the current Local Plan, to ensure new developments are in line with the borough's existing character and scale. Additionally, they propose revising Policy H4 to focus exclusively on brownfield sites, consistent with the London Plan's guidelines, to avoid unnecessary Green Belt development and better integrate new housing into areas with existing infrastructure. These recommendations aim to ensure that the Local Plan supports sustainable development while preserving Enfield's Green Belt and community identity. | Comments noted. The Draft Local Plan has been carefully developed to address the significant housing needs within Enfield while adhering to sustainable development principles. According to the Spatial Strategy and Overall Approach Topic Paper, the Plan includes a thorough review of the Green Belt, identifying sites where "exceptional circumstances" justify the release of land. This is done to meet critical housing demands that cannot be fulfilled through brownfield sites alone. The Plan strategically focuses on minimizing the impact on the most sensitive areas by directing growth toward locations that can accommodate development while preserving the essential functions of the Green Belt, such as preventing urban sprawl and maintaining the character of the borough's distinct communities. Regarding the introduction of tall buildings, the Design and Character evidence base ensures that any new developments, including those involving taller structures, are designed to complement the existing urban fabric and preserve the character of areas like Southgate. The Plan includes stringent design criteria to ensure that taller buildings are appropriately located and do not detract from the historical and architectural significance of nearby heritage assets, such as the Southgate Underground Station. By focusing on areas with strong transport links and existing infrastructure, the Plan aims to integrate new developments in a way that enhances urban areas while safeguarding the unique character of Enfield's neighborhoods. The Council remains committed to ensuring that the Local Plan is both legally compliant and responsive to the community's needs, promoting sustainable growth that respects Enfield's Green Belt and architectural heritage. The Plan's approach to housing targets, Green Belt protection, and tall buildings demonstrates a balanced strategy aimed at fostering development that aligns with regional planning objectives and local character preservation. | No | 01670 | Cllr Morreale |
| **SP SS1: Spatial strategy** | Regulation 19 should not proceed because Enfield's Green Belt is essential for health, well-being, and future generations. Building on it would increase cars and pollution, harming the environment. Crews Hill, a popular attraction, would suffer, affecting jobs and livelihoods. The CPRE, Enfield Society, and Enfield Roadwatch have identified space for 37,000 homes within the borough, negating the need to develop Green Belt land. The council should utilize these underused sites instead to preserve the Green Belt, which is why many residents choose to live in Enfield. | The Enfield Local Plan's spatial strategy and overall approach aim to balance housing growth with environmental sustainability and community benefits. The plan includes measures to ensure the viability of affordable housing and addresses the need for development on both brownfield and Green Belt sites. It aligns with the National Planning Policy Framework and the London Plan, focusing on sustainable, well-integrated growth while preserving the natural and historic environment. This approach ensures comprehensive development that meets Enfield's housing needs without compromising environmental and community values. | No | 01762 | Cllr O'Halloran |
| **SP SS1: Spatial strategy** | The Councillor for Southgate Ward argued that the draft plan, justified by Enfield's high housing need, sets an excessively high and unsustainable target as set out in policy SS1. They pointed out that this plan assumes a significant population increase in Enfield, despite the declining population and falling birth rate in London. | Comments noted. The Local Plan seeks to significantly increase the number of new homes to meet a wide range of needs including affordable homes, accessible homes and homes for older people. It also seeks to regenerate and renew the Borough and is considered the be an appropriate strategy | No | 01836 | Cllr Morreale |

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| **SP SS1: Spatial strategy** | The Councillor for Southgate Ward criticised the proposed policy for its vague statements in SS1, highlighting that the plan's lack of specificity would allow for broad interpretation and excessive discretion in its application. | Comments noted. Each application will be determined on its own merits, and each site's characteristics will vary. | No | 01836 | Cllr Morreale |
| **SP SS1: Spatial strategy** | The Councillor for Southgate Ward argued that the approach set out in the Local Plan would significantly harm the borough's identity by introducing urban homes in rural areas like Crews Hill and Chase Park, undermining the character of these communities. | Comments noted. The Local Plan seeks to significantly increase the number of new homes to meet a wide range of needs including affordable homes, accessible homes and homes for older people. It also seeks to regenerate and renew the Borough and is considered the be an appropriate strategy | No | 01836 | Cllr Morreale |
| **SP SS1: Spatial strategy** | The Councillor for Southgate Ward stated that the policy set out in SS1 would negatively impact the character of Enfield's Green Belt, as outlined in the local plan. They emphasised that this would lead to the permanent destruction of a significant part of Enfield's green land and historical heritage. | Comments noted. The Local Plan seeks to significantly increase the number of new homes to meet a wide range of needs including affordable homes, accessible homes and homes for older people. It also seeks to regenerate and renew the Borough and is considered the be an appropriate strategy | No | 01836 | Cllr Morreale |
| **SP SS1: Spatial strategy** | The Councillor for Southgate Ward criticised Enfield Council's poor record of housing development, arguing that this shortfall is being used to justify inappropriate Green Belt development as set out in SS1. | Comments noted. Justification is set out in the Exceptional Circumstances Topic Paper and Housing Topic Paper, which have addressed these points. | No | 01836 | Cllr Morreale |
| **SP SS1: Spatial strategy** | The Councillor for Southgate Ward highlighted that nearly all 7,000 residents who responded to the 2021 Plan consultation opposed Green Belt development, tall buildings, and their impact on Conservation areas. Despite this, the March 2024 plan increases the number of tall buildings and continues to propose building on the Green Belt. | The Local Plan has undergone substantial revisions since the 2021 consultation, reflecting the feedback received. While the Local Plan includes some Green Belt sites, this decision was made after exhaustive consideration of all possible alternatives. We have focused on sites that offer the least impact on the Green Belt and have ensured that any development is in line with national and local policy requirements. The need for housing is critical, and Green Belt land is only considered when other options have been exhausted. The plan has carefully reviewed the scale and height of proposed developments to balance housing needs with preserving the character of Conservation areas. While some tall buildings are included, they are strategically located to minimize impact on sensitive areas. We are committed to ensuring that these developments adhere to stringent design guidelines to preserve local character and heritage. The Council has incorporated enhanced protections for Conservation areas into the Local Plan. Development proposals are subject to rigorous assessment to ensure they respect the historical and architectural significance of these areas. We are also working on improving policies related to heritage conservation to better align with residents' concerns. The Council is committed to continued dialogue with residents and stakeholders. The plan will include mechanisms for regular reviews and adjustments based on community feedback and evolving needs. This ensures that the plan remains responsive and aligned with the priorities of our residents. The plan aims to balance development needs with sustainability and conservation priorities. By focusing on sustainable growth, we hope to address housing shortages while preserving the environmental and cultural assets of our borough. | No | 01836 | Cllr Morreale |
| **SP SS1: Spatial strategy** | Joanne McCartney, AM for Enfield and Haringey, expressed significant concerns about proposals to build on large areas of the Green Belt and other green spaces. She highlighted the negative impact on the environment, loss of vital green spaces, growing spaces, and farmland. She stressed that eroding Green Belt protections undermines efforts to check urban sprawl, provide food growing spaces, recreational areas, and counter the urban heat island effect. | Comments noted. The Local Plan seeks to significantly increase the number of new homes to meet a wide range of needs including affordable homes, accessible homes and homes for older people. It also seeks to regenerate and renew the Borough and is considered the be an appropriate strategy | No | 01896 | Joanne McCartney AM London Assembly Member for Enfield and Haringey |
| **SP SS1: Spatial strategy** | Joanne McCartney, AM for Enfield and Haringey, expressed the need for a stronger 'brownfield first approach' in identifying sites and finding capacity for new housing. Question whether this has been adequately addressed in the current version of the plan. | Comments noted. The Local Plan is based on a brownfield first approach, in line with National Planning Policy Framework. | No | 01896 | Joanne McCartney AM London Assembly Member for Enfield and Haringey |

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| **SP SS1: Spatial strategy** | Joanne McCartney, AM for Enfield and Haringey, expressed importance of retaining open and green spaces, especially as many new homes may not have direct access to gardens or amenity spaces. | Comments noted. Provision of open space within developments is set out throughout the Plan | No | 01896 | Joanne McCartney AM London Assembly Member for Enfield and Haringey |
| **SP SS1: Spatial strategy** | Joanne McCartney, AM for Enfield and Haringey, raised concerns about the low Public Transport Accessibility Level (PTAL) scores for developments in areas like Crews Hill. She noted that this would lead to increased reliance on cars, contradicting policy objectives of reducing congestion and air pollution, and promoting healthy lifestyles. | Comments noted. The Council acknowledge the challenges associated with PTAL scores in such areas. However, the Crews Hill Topic Paper 2024 outlines several strategies to mitigate these issues. These include significant investments in sustainable transport infrastructure, such as improved cycling and walking routes, and enhancements to public transport services. These measures aim to reduce car dependency, align with our policy objectives of reducing congestion and air pollution, and promote healthy lifestyles. The Council is committed to continuing our efforts to improve transport accessibility and support sustainable development in Crews Hill. | No | 01896 | Joanne McCartney AM London Assembly Member for Enfield and Haringey |
| **SP SS1: Spatial strategy** | Joanne McCartney, AM for Enfield and Haringey, expressed concern that the plan may contravene the Mayor's London Plan, which emphasizes the protection and roles of the Green Belt. | Comments noted. The Exceptional Circumstances Topic Paper 2024 outlines that the proposed amendments to the Green Belt boundaries are based on strategic-level exceptional circumstances. These circumstances are justified by the need to meet housing and employment targets, ensuring sustainable development while protecting the most valuable green spaces. The plan emphasizes that the modifications are minimal and necessary to achieve the overall development goals in line with the London Plan's objectives. | No | 01896 | Joanne McCartney AM London Assembly Member for Enfield and Haringey |
| **SP SS2: Making good places** | Historic England commend the Council's efforts and the positive aspects of the draft Plan, especially Policies SS2 and DE1, which aim to create well-designed, high-quality environments that respect the historic context. However, their main concern at this stage is the approach to tall buildings. Detailed comments on the policy framework and proposed Allocations are included in Appendices A and B. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SP SS2: Making good places** | Historic England objects to the current wording of clause 4d in Policy SS2. The phrasing requiring development proposals to "promote and support" heritage assets is ambiguous and does not sufficiently align with statutory obligations or national policy concerning the historic environment. To ensure the policy is sound and in line with legislative requirements, Historic England recommends amending clause 4d to: "conserve and enhance the significance of the Borough's historic environment and cultural assets." This revision provides clearer direction and ensures compliance with national heritage policies. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SP SS2: Making good places** | TfL welcomes the inclusion of cycling infrastructure contributions from major developments in Part 5. They suggest also mentioning contributions towards bus stops and crossings improvements. For Part 9, TfL appreciates the reference to car parking but recommends amending the wording to: "development should minimise the amount of car parking spaces as well as the negative impacts of car parking and servicing." | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP SS2: Making good places** | Sport England believes that new developments, particularly residential ones, will increase demand for sporting facilities, potentially worsening existing or future deficiencies. Therefore, new developments should contribute to meeting this demand through on-site facilities or additional off-site capacity. The provision level and nature should be guided by a robust evidence base, such as an up-to-date PPS and BFS or other relevant assessments. Sport England recommends including specific policy wording to ensure sports and recreational facilities are considered in new developments. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP SS2: Making good places** | Sport England advocates for the inclusion of Active Design principles when developing new and enhanced communities. They emphasize that well-designed living and working environments are crucial for keeping people active and that | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common | No | 01967 | Sport England |

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| | placemaking should encourage active lifestyles. Sport England, in collaboration with Public Health England and Active Travel England, has released revised Active Design guidance to inform urban design for promoting sport and active lifestyles. This guidance includes a checklist and model policy available on their website. Given the proposed significant growth, it is vital to have up-to-date and robust PPS and BFS strategies to mitigate potential negative impacts on sports facilities, underscoring their importance in the Local Plan. | Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SP SS2: Making good places** | Sport England is concerned that there is no reference to enhancing or providing sports facilities to meet current deficits or future needs in major place expansions. They recommend including wording similar to policy CL5 paragraph 9 to ensure new developments provide sport and physical activity provisions to meet growing demand. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP SS2: Making good places** | Joseph Homes supports strategic policy SS2 ‘Making Good Places’ which outlines a strategy of good growth though placemaking. It states that carefully designed urban intensification will be supported where its sympathetic to local character. This principle aligns with the London Plan objective to make best use of brownfield land and is fully supported. The policy’s requirements for masterplans that encourage comprehensive redevelopment is also supported. The policy states that the Council will support the preparation of a Planning Brief that is brought forward by landowners in consultation with the Council. This could be progressed to a Supplementary Planning Document for complex sites. This principle is also supported. | The support for the policy’s approach to comprehensive redevelopment through masterplans and the potential for landowner-led Planning Briefs to be progressed to Supplementary Planning Documents for complex sites is also appreciated. The council looks forward to continued collaboration in shaping well-designed, sustainable developments that are sympathetic to local character. | No | 01875 | Joseph Homes Regeneration Limited |
| **SP SS2: Making good places** | Landvest Crews Hill Ltd argues that significant work, including a Spatial Framework for Crews Hill, has already been done as part of the Local Plan evidence base. It asserts that planning applications should be evaluated on their own merits rather than awaiting the preparation of a Supplementary Planning Document (SPD). The representation cites the National Planning Policy Framework (NPPF), which states that refusal of planning permission on the grounds of prematurity is seldom justified. Therefore, the representation contends that Policy SS2’s presumption against supporting development until an SPD is prepared is inconsistent with national policy, ineffective, and will hinder timely and deliverable development. | The requirement for a Supplementary Planning Document (SPD) in Policy SS1 is essential to ensure that development in the Crews Hill Placemaking Area is well-coordinated and aligned with the strategic objectives of the Local Plan. This approach meets the tests of soundness: it is positively prepared by aligning with the Local Plan’s vision; justified as it addresses the complexity and scale of the development with detailed guidance; effective in providing clarity and reducing uncertainties; and consistent with national policy, which supports detailed planning guidance. The SPD will build on the existing Spatial Framework and evidence base, ensuring that all aspects of development are comprehensively addressed, and facilitates a structured approach to delivering sustainable growth in Crews Hill. | No | 01894 | Landvest Crews Hill Ltd |
| **SP SS2: Making good places** | Landvest Crews Hill Ltd requests the removal of the requirement for comprehensive masterplans to be approved before development in Crews Hill and Chase Park, recommending instead a more flexible approach that considers the principles already set out in the Local Plan. | The SPD requirement is designed to ensure comprehensive, well-planned development, but the Council remains committed to working with developers to avoid unnecessary delays. | No | 01894 | Landvest Crews Hill Ltd |
| **SP SS2: Making good places** | CCLA Investment Management supports the inclusion of "designated urban intensification" in Policy SS2, emphasizing sympathetic redevelopment to local character and heritage while considering site constraints and pollution effects, as per NPPF paragraph 191. They find the requirement for schemes over 500sqm to demonstrate contributions to "placemaking areas" inconsistent with NPPF paragraph 35(c), as not all sites fall within these areas. They propose that the policy reflect this to ensure it is effective and appropriate for various site contexts. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett’s Lock Lane |
| **SP SS2: Making good places** | Rockwell supports the general principles of Policy SS2 but raises concerns regarding SS2(3), which requires comprehensive masterplans for Crews Hill and Chase Park must be prepared and approved before development can commence. They argue that this requirement could delay the lead-in times and overall delivery of the Crews Hill project. Additionally, Rockwell suggests that the SPD should be | The Council acknowledges Rockwell’s concerns regarding the preparation of the Supplementary Planning Document (SPD) for Crews Hill and Chase Park. However, the Council maintain that a comprehensive SPD is essential to ensure a coordinated and cohesive approach to the development of these significant placemaking areas. The requirement for an SPD to be prepared and approved | No | 01932 | Rockwell London Ltd for Kings Oak |

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| | used to expand on existing policies rather than introducing new requirements or financial burdens, which should instead be addressed in a Development Plan Document. They recommend removing the pre-approval requirement for the SPD to streamline the development process. | before development ensures that all aspects of the development, including infrastructure, design, and phasing, are thoroughly planned and integrated. This approach helps prevent piecemeal development and ensures that the new communities are developed in a manner that aligns with the overall vision and strategic objectives of the Local Plan. While the SPD will expand upon existing policy requirements, its purpose is to provide detailed guidance rather than introducing entirely new requirements or financial burdens. The Council is committed to expediting the preparation of the SPD in parallel with the Local Plan process to minimize delays and ensure clarity for all stakeholders. This coordinated approach is crucial for delivering the high-quality, sustainable communities envisioned for Crews Hill and Chase Park. | | | |
| **SP SS2: Making good places** | Blackrock UK Property Fund's response to Draft Policy SS2 highlights concerns about the requirement for a Masterplan for all non-residential developments of 500 sq m or more. While they support the objectives of ensuring high-quality and sustainable development, they argue that the Masterplan requirement is excessive and not well-defined. They note that Masterplans are generally for complex developments involving multiple uses and land ownerships, whereas developments of 500 sq m are typically minor with few impacts. They contend that the requirement would place an unreasonable burden on straightforward proposals, particularly in SIL areas, where a Design and Access Statement should suffice. They believe this part of the policy is inconsistent with legislative requirements under the 1990 Town and Country Act, which mandates that information requirements should be reasonable. They suggest amending the policy to specify that only larger, more complex developments should require a Masterplan. | The Council appreciates Blackrock UK Property Fund's support for Draft Policy SS2's objectives but acknowledges concerns regarding the requirement for a Masterplan for non-residential developments of 500 sq m or more. Recognizing this threshold may be burdensome for smaller projects, particularly in SIL areas, the Council will review and refine the policy to ensure it applies primarily to larger, complex developments. This adjustment aims to align with legislative requirements and practical considerations. The Council is committed to working collaboratively through a Statement of Common Ground to ensure the policy is clear, justified, and effectively supports high-quality development. | No | 01952 | Blackrock UK Property Fund |
| **SP SS2: Making good places** | Regenta Development raises concerns about the requirement for larger developments to include a masterplan and delivery plan under Policy SS2. They argue that the threshold of 50 homes is too low, as a full planning application for such sites would cover the same requirements. They suggest that masterplans should be required only for larger schemes (e.g., 100 homes or more) to avoid unnecessary delays. Additionally, the need for a coordinated approach in multiple ownership situations may be impractical if neighboring landowners are uncooperative. Regenta Development supports the inclusion of a Borough-wide design guide and recommends it align with London Plan Policy D3. | Comments noted. Enfield's local circumstances necessitate a balanced approach, with a threshold of 50 homes set to maintain high design standards and coordinated growth. The council acknowledges the need for flexibility and will consider adjusting the threshold to 100 homes for masterplan requirements. Additionally, the council will take a pragmatic approach to collaboration among multiple landowners, ensuring that development is not unduly delayed. The Borough-wide design guide will be developed in consultation with local communities and stakeholders, aligning with London Plan Policy D3 to optimize land use. | No | 01984 | Regenta Development |
| **SP SS2: Making good places** | London Wildlife Trust welcome and support this policy, especially part 4. Design f). and the supporting para 2.41. | Support noted. | No | 01974 | London Wildlife Trust |
| **SP SS2: Making good places** | London Wildlife Trust welcome and support the policies in this chapter. | Support noted. | No | 01974 | London Wildlife Trust |
| **SP SS2: Making good places** | The Hadley Wood Neighbourhood Forum argues that the policy on "Making Good Places" (SS2) is flawed, as intensification around Hadley Wood station, which has poor transport accessibility and limited local services, fails to meet "good growth" objectives. | The Council emphasizes that the strategy is designed to balance growth across the borough while addressing local needs and characteristics. The Spatial Strategy and Site Allocation Topic Papers, recognises that infrastructure investments are planned in conjunction with development, particularly in areas identified for growth. The strategy is evidence-based, with careful consideration given to transport accessibility, infrastructure, and sustainable development in different localities, including Hadley Wood. The Council is committed to ensuring that any proposed growth aligns with sustainable development principles, tailored to the specific context of each area. | No | 01669 | Hadley Wood Neighbourhood Planning Forum |
| **SP SS2: Making good places** | Enfield Road Watch argues that the "Making Good Places" policy in the local plan does not align with the London Plan's definition of Good Growth. They believe the policy fails to meet the standards and principles outlined in the London Plan, which emphasizes sustainable, inclusive, and well-designed development. | Comments noted. Enfield's Local Plan aligns with the London Plan's definition of Good Growth, emphasizing sustainable, inclusive, and well-designed development. The ELP Spatial Strategy and Overall Approach document outlines that the Council's growth strategy includes brownfield regeneration, town center developments, and enhancements to the existing urban areas, ensuring that development respects local character and environmental quality. The Chase Park | No | 01687 | Enfield Road Watch |

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| | | Topic Paper further emphasizes creating new open spaces and enhancing ecological value, aligning with the principles of Good Growth by prioritizing sustainable and community-oriented development. The Council has also engaged in extensive consultation and cooperation with stakeholders to ensure that the Local Plan meets the highest standards of planning and development, as detailed in the Duty to Cooperate Statement. This approach ensures that Enfield's growth is well-integrated, environmentally sustainable, and supportive of community needs. | | | |
| **SP SS2: Making good places** | The Enfield Society argues that the Enfield Local Plan misinterprets the London Plan's concept of Good Growth, as outlined in their comments on Policy SS1, paragraph 1. They also contend that nearly all requirements in Policy SS2 are redundant, as they are already covered elsewhere in the plan. Therefore, they believe this policy and its explanation should be deleted to comply with NPPF Paragraph 15, which calls for concise plans, and NPPF Paragraph 16(d), which seeks to clarify how decision-makers should react by reducing unnecessary information. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP SS2: Making good places** | The Enfield Society's concerns regarding Paragraph 1 highlight that the aim to ensure ‘active travel predominates’ at Chase Park and Crews Hill may be impractical due to the area's topography and connections. They argue that the policy is inconsistent with the London Plan’s Good Growth principles, specifically the need to protect open spaces, including the Green Belt, as outlined in London Plan Policies GG2 and G1. They suggest this inconsistency needs to be carefully examined and addressed. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP SS2: Making good places** | The Enfield Society raises concerns about the masterplanning policy, noting it may be ineffective if it conflicts with the Council’s corporate asset strategy to raise £800 million through the sale of Green Belt land. This is particularly concerning given the proposed Green Belt releases at Crews Hill and East of Junction 24. They argue there is a risk that development could exceed indicated extents or proceed regardless of policy restrictions, making the policy unlikely to be effective in managing coordinated development in these areas. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP SS2: Making good places** | The Enfield Society expresses concerns that parts 1, 2, and 10 of Policy SS2, promoting tall buildings, are not justified and conflict with national and London Plan policies. They argue that Enfield Town's unique character, defined by its low-rise, market-town ambiance, would be compromised by tall buildings. The Society references the Enfield Characterisation Study and urbanist Ian Nairn to emphasize the importance of preserving this character. They believe the proposed policy disperses crucial information across various documents, leading to potential misunderstanding and harm to the historic environment and local identity. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |

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| **SP SS2: Making good places** | Joanne McCartney, AM for Enfield and Haringey, supports the commitment to require masterplans for larger developments. | Support noted. | No | 01896 | Joanne McCartney AM London Assembly Member for Enfield and Haringey |
| **Chapter 3: Places** | | | | | |
| **SP PL1: Enfield Town** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |
| **SP PL1: Enfield Town** | Historic England objects to the current wording of Policy PL1. The area in question includes a significant concentration of designated heritage assets, whose historic character and significance are particularly sensitive to change. To ensure the protection of these assets, the policy should be strengthened with additional wording to guarantee that development proposals adequately address their conservation. To ensure the policy is sound and in line with legislative requirements, Clause 4 should require that development proposals "demonstrate how they have facilitated the conservation and enhancement of the area's historic character and designated heritage assets." This addition would provide clearer guidance, ensuring that heritage considerations are appropriately integrated into development plans. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SP PL1: Enfield Town** | Historic England objects to the current wording of Policy PL1. To ensure the policy is sound and fully compliant with legislative requirements, Historic England recommends the addition of a new clause (Clause 5) to Policy PL1. The proposed wording is as follows: "Development proposals should demonstrate how they have given due regard to the Enfield Town Conservation Area Appraisal and Management Proposals." This addition would help ensure that development within the conservation area aligns with established heritage guidelines and contributes to the protection and enhancement of the area's historic significance. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SP PL1: Enfield Town** | TfL welcomes the statement about seeking contributions to increase station capacity and improve station access. They note that while gateline capacity could be increased within the existing station, achieving step-free access may require a broader station reconfiguration and access to adjacent land. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL1: Enfield Town** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL1: Enfield Town and its site allocations inlcuding SA1.1: Palace Gardens Shopping Centre, SA1.2: Enfield Town Station and Former Enfield Arms, SA1.3: Tesco, Southbury Road, SA1.4: Enfield Civic Centre, SA1.5: St Anne's Catholic High School for Girls, SA1.6: 100 Church Street, SA1.7: Oak House, 43 Baker Street - this includes the New River. | The Council acknowledges the importance of highlighting nearby water bodies and will ensure they are referenced in the relevant site allocations. For Policy PL1: Enfield Town, including sites SA1.1 (Palace Gardens Shopping Centre), SA1.2 (Enfield Town Station and Former Enfield Arms), SA1.3 (Tesco, Southbury Road), SA1.4 (Enfield Civic Centre), SA1.5 (St Anne's Catholic High School for Girls), SA1.6 (100 Church Street), and SA1.7 (Oak House, 43 Baker Street), this includes the New River. We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | Yes | 01926 | Environment Agency |

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| **SP PL1: Enfield Town** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SP PL1: Enfield Town** | Thames water comments that there is insufficient information to make an assessment of the impact upon the waste water network. and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing. On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to the DOMESTIC element to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SP PL1: Enfield Town** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
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| **SP PL1: Enfield Town** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
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| **SP PL1: Enfield Town** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SP PL1: Enfield Town** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SP PL1: Enfield Town** | Places for London supports the inclusion of Enfield Town Station in the Enfield Town Placemaking Area and the encouragement of tall buildings in this area. They recommend rewording Supporting Paragraph 3.20 to emphasize the incorporation and encouragement of tall buildings around railway stations to accommodate growth. They believe housing delivery on station car parks will reduce car dependency and promote sustainable travel, aligning with London Plan Policies HI and DI that encourage higher density development in areas with high transport accessibility. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **SP PL1: Enfield Town** | Better Homes Enfield  critiques the Enfield Local Plan (ELP), specifically Policy PL1 concerning Enfield Town, arguing that the plan misses significant opportunities for land assembly and site optimization, which are essential for meeting development needs. The group points out that several sites, such as the | Comments noted. The ELP's approach to site allocations, including those in Enfield Town, is guided by a careful consideration of the current land use, ownership, and the realistic potential for development within the plan period. The Site Allocation Topic Paper emphasizes that the selection of sites for inclusion in | Yes | 01708 | Better Homes Enfield |

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| | BT Exchange on Cecil Road, the Royal Mail depot near Tesco Southbury Road, and the disused police station near Enfield Civic Centre, were not included in the site allocations despite their potential for contributing to housing and regeneration objectives. The group highlights that including these sites and considering land assembly could substantially increase the housing capacity and enhance the overall development outcomes for Enfield Town. The group's recommendations call for the ELP to be revised to include these missed sites and to adopt a more proactive approach to land assembly, possibly using compulsory purchase orders (CPO) if necessary. The document suggests that by doing so, the ELP would better align with the National Planning Policy Framework (NPPF) and the London Plan, both of which emphasize the need for optimizing the use of land, especially in sustainable locations like town centers. The group concludes that without these adjustments, the ELP may not meet the soundness criteria required by the NPPF or be fully compliant with the London Plan, potentially undermining its effectiveness in delivering "Good Growth" for Enfield. | the ELP was based on detailed assessments of their development potential, existing constraints, and the need to balance housing delivery with the preservation of important town center functions and character. While the evidence acknowledges the potential for land assembly, such as incorporating the BT Exchange site or the Royal Mail depot, these opportunities were evaluated within the broader context of their feasibility, land ownership complexities, and alignment with strategic objectives for Enfield Town. The plan remains flexible and allows for future opportunities to optimize these sites as conditions evolve, but the current allocations reflect what is considered deliverable and beneficial for the community within the existing planning context. Moreover, the ELP aligns with both the National Planning Policy Framework (NPPF) and the London Plan by promoting a design-led approach to development that seeks to optimize site capacity while ensuring that growth is sustainable and enhances the character of Enfield Town. The current allocations in Enfield Town are part of a broader strategy that prioritizes incremental and context-sensitive development, ensuring that new housing and commercial spaces are integrated with existing infrastructure and community needs. The use of compulsory purchase orders (CPO) for land assembly is a tool that the Council considers cautiously, as it requires clear evidence of public benefit and alignment with broader strategic goals. The ELP remains open to revising and optimizing site allocations as new opportunities arise, ensuring that it continues to meet the needs of Enfield's residents while complying with regional and national planning policies. In summary, the site allocations for Enfield Town in the ELP are based on a balanced and realistic assessment of development potential, aligned with the principles of the NPPF and the London Plan. While the plan acknowledges the potential for land assembly and optimization, the current allocations reflect a pragmatic approach that considers the complexities of land ownership, existing uses, and the need to ensure sustainable growth. The ELP's flexibility allows for future revisions as conditions change, ensuring that Enfield Town can continue to thrive as a key center for housing and employment within the borough. | | | |
| **SP PL2: Southbury** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |
| **SP PL2: Southbury** | TfL appreciates the policy changes made in response to their comments, including references to public transport contributions and support for car-free developments in Part 8. They strongly support the inclusion of Part 8d, which emphasizes retaining a bus station with improved pedestrian links, and Part 9, which encourages modal shifts by reducing car parking and enhancing walking, cycling, and public transport infrastructure. TfL also supports Part 10c, ensuring any traffic changes safeguard the bus station's efficiency and capacity. They have provided detailed bus station requirements and agreed on changes to town centre highway links for bus rerouting. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL2: Southbury** | Sport England supports the strategic policy PL2: Southbury, which addresses enhancements to nearby open spaces such as Enfield Playing Fields and St. George's Playing Fields. However, they note the lack of up-to-date evidence to determine what specific enhancements are needed to support the population increase from the area's expansion. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |

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| **SP PL2: Southbury** | Turley on behalf of Royal London propose changes to the wording of this Policy to improve flexibility of housing types. | Noted. The Council will enter into a Statement of Common Ground with Royal London to address these concerns and ensure alignment with strategic goals and policies. | No | 01749 | Royal London Mutual Insurance Society Limited for Southbury Leisure Park |
| **SP PL2: Southbury** | SEGRO supports the general direction of Policy PL2, especially the requirement for residential proposals near Strategic Industrial Locations (SIL) not to compromise industrial operations. However, SEGRO is concerned that policies PL2 and E3 could mandate intensification and increased floorspace/job density within SIL areas, which might not always align with specific business needs or site characteristics. They emphasize the importance of flexibility in these policies, considering the diverse requirements of logistics and distribution businesses, the high costs and challenges of multi-level warehousing, and alternative measures of industrial intensification beyond just increasing floorspace. | The council appreciates SEGRO's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with SEGRO and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01922 | SEGRO |
| **SP PL2: Southbury** | Blackrock UK Property Fund's response highlights concerns regarding Draft Policy SS2 and the Southbury placemaking area allocation (SA2.1) for the Colosseum Retail Park. The hybrid permission for this site, which allows for 444 residential units and 5,802 sq m of flexible commercial use, faces significant viability challenges due to market conditions, high-interest rates, and increased construction costs. Consequently, this permission is unlikely to be implemented before it lapses in July 2024. They suggest that the site allocation should be amended to include industrial development (B2/B8 uses) to improve viability and align with demand for employment uses. They recommend a more flexible policy approach that accommodates various development typologies, incorporating both economic and placemaking perspectives, and propose the preparation of a Masterplan to detail the quantum and mix of uses. This amendment would better respond to market demands and ensure the sustainable development of the site. | The Council appreciates the feedback provided by Blackrock UK Property Fund on Draft Policy PL2 and the site allocation SA2.1 for the Colosseum Retail Park. The Council acknowledges the viability challenges highlighted and the need for a flexible approach to ensure sustainable and high-quality development. 1. Draft Policy PL2: The requirement for a Masterplan for non-residential development of 500 sq m or more is intended to ensure comprehensive and coherent development that aligns with the overarching goals of the Enfield Local Plan. However, the Council recognizes that this requirement may be seen as burdensome for smaller-scale developments.<br>To address these concerns, the Council is willing to consider amendments to ensure that the requirement for a Masterplan is proportionate to the scale and complexity of the development. This will ensure that the policy remains effective without imposing undue burdens on smaller projects. 2. Southbury Placemaking Area (SA2.1): The Council acknowledges the issues raised regarding the viability of the current hybrid permission for the Colosseum Retail Park. The Site Allocation Topic Paper for Regulation 19 highlights the importance of flexibility in responding to changing market conditions and development challenges. The Council is open to discussing the inclusion of industrial uses (B2/B8) as part of a mixed-use development for the site. This approach aligns with the strategic objective to maximize employment opportunities and support the local economy, as outlined in the Spatial Strategy and Overall Approach Topic Paper. The Council supports the preparation of a Masterplan to provide detailed guidance on the quantum and mix of uses, ensuring that development proposals make the best use of land while adhering to high-quality design principles. he Council is committed to a collaborative approach and is willing to engage with Blackrock UK Property Fund through a Statement of Common Ground. This will ensure that the Local Plan policies and site allocations are refined to be both practical and effective, meeting the needs of developers while achieving the strategic objectives of sustainable growth and high-quality placemaking. | No | 01952 | Blackrock UK Property Fund |
| **SP PL2: Southbury** | Blackrock UK Property Fund's response highlights concerns regarding Draft Policy SS2 and the Southbury placemaking area allocation (SA2.1) for the Colosseum Retail Park. The hybrid permission for this site, which allows for 444 residential units and 5,802 sq m of flexible commercial use, faces significant viability challenges due to market conditions, high-interest rates, and increased construction costs. Consequently, this permission is unlikely to be implemented before it lapses in July 2024. They suggest that the site allocation should be amended to include industrial development (B2/B8 uses) to improve viability and align with demand for employment uses. They recommend a more flexible policy approach that accommodates various development typologies, incorporating both economic and placemaking perspectives, and propose the preparation of a | The Council appreciates the feedback provided by Blackrock UK Property Fund on Draft Policy PL2 and the site allocation SA2.1 for the Colosseum Retail Park. The Council acknowledges the viability challenges highlighted and the need for a flexible approach to ensure sustainable and high-quality development. 1. Draft Policy PL2: The requirement for a Masterplan for non-residential development of 500 sq m or more is intended to ensure comprehensive and coherent development that aligns with the overarching goals of the Enfield Local Plan. However, the Council recognizes that this requirement may be seen as burdensome for smaller-scale developments.<br>To address these concerns, the Council is willing to consider amendments to ensure that the requirement for a Masterplan is proportionate to the scale and complexity of the development. This will ensure that the policy remains effective | No | 01952 | Blackrock UK Property Fund |

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| | Masterplan to detail the quantum and mix of uses. This amendment would better respond to market demands and ensure the sustainable development of the site. | without imposing undue burdens on smaller projects. 2. Southbury Placemaking Area (SA2.1): The Council acknowledges the issues raised regarding the viability of the current hybrid permission for the Colosseum Retail Park. The Site Allocation Topic Paper for Regulation 19 highlights the importance of flexibility in responding to changing market conditions and development challenges. The Council is open to discussing the inclusion of industrial uses (B2/B8) as part of a mixed-use development for the site. This approach aligns with the strategic objective to maximize employment opportunities and support the local economy, as outlined in the Spatial Strategy and Overall Approach Topic Paper. The Council supports the preparation of a Masterplan to provide detailed guidance on the quantum and mix of uses, ensuring that development proposals make the best use of land while adhering to high-quality design principles. he Council is committed to a collaborative approach and is willing to engage with Blackrock UK Property Fund through a Statement of Common Ground. This will ensure that the Local Plan policies and site allocations are refined to be both practical and effective, meeting the needs of developers while achieving the strategic objectives of sustainable growth and high-quality placemaking. | | | |
| **SP PL2: Southbury** | BL Logistics Investment Limited (British Land) broadly support the placemaking vision but request the boundary be extended to fully encompas the whole trading estate SIL. They request further rewording to clairfy requirements for SuDS and placemaking principles | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **SP PL3: Edmonton Green** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |
| **SP PL3: Edmonton Green** | Historic England considers the current wording of Policy PL3 to be unsound. The placemaking area either encompasses or is adjacent to three distinct conservation areas, yet none of these are acknowledged within the policy's context, characteristics section, or vision for the area. Given the scale of growth anticipated, it is essential that the historic character of the area is explicitly referenced within the policy to ensure that new development is sensitive to and reflects its unique context. To address the policy's soundness, Historic England recommends adding Clause 5: "…that contribute to Edmonton Green's identity, including its historic character and heritage significance, as articulated in the relevant conservation area appraisals and management proposals." This addition would help ensure that the policy appropriately considers the area's heritage, guiding development in a way that respects, preserves, and enhances its historic and cultural significance. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SP PL3: Edmonton Green** | TfL notes and welcomes the changes to the placemaking vision, which now emphasise active travel corridors over new rapid transport, as the latter is unlikely to be viable within the current Local Plan timescales. They highlight that the Superloop route SL1 provides some benefits but requires complementary measures like bus priority and improved bus infrastructure to support its introduction. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL3: Edmonton Green** | The Environment Agency recommends strengthening Point 10 of Policy PL3 – Edmonton Green by changing the wording from "should explore the following further infrastructure improvements where feasible" to "must explore," and suggests removing the phrase "where feasible" to ensure stronger commitment to infrastructure improvements. | The Council acknowledges the Environment Agency's recommendation to strengthen the language in Point 10 of Policy PL3 – Edmonton Green. We will review the suggestion to replace "should explore" with "must explore" and consider removing "where feasible" to provide greater clarity and commitment to infrastructure improvements. The Council is committed to continuing our | Yes | 01926 | Environment Agency |

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| | | collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | | | |
| **SP PL3: Edmonton Green** | The Environment Agency recommends expanding the 'Green Infrastructure' policy in PL3 – Edmonton Green to 'Green and Blue Infrastructure' to better reflect the significance of watercourses within the area. Additionally, the EA strongly suggests incorporating a standalone policy point on flood risk, given the flood risk issues in Edmonton Green, and adding a specific policy point for groundwater and land quality to address historic contamination. The EA supports the inclusion of wording on the naturalisation and ecological enhancement of waterways and recommends applying this to all place policies with rivers, including PL3. Furthermore, they suggest making a clear distinction between fluvial and surface water flood risks. | The Council welcomes the detailed feedback on Policy PL3 – Edmonton Green. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |
| **SP PL3: Edmonton Green** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL3 – Edmonton Green and its site allocations including Sites SA3.1: Edmonton Green Shopping Centre and SA3.2: Chiswick Road Estate, this includes the Salmon Brook upstream of Deephams Sewage Treatment Works, emphasizing the importance of naturalisation efforts in this area. | The Council acknowledges the importance of highlighting nearby water bodies and will ensure that they are referenced in relevant site allocations. We will also review the place policies, including PL3 – Edmonton Green, to incorporate wording that encourages or requires river restoration and naturalisation, specifically addressing areas such as Salmon Brook upstream of Deephams Sewage Treatment Works. We appreciate the Environment Agency's recommendations and will work to ensure these considerations are reflected in the Local Plan. | Yes | 01926 | Environment Agency |
| **SP PL3: Edmonton Green** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL3 – Edmonton Green and its site allocations including Sites SA3.1: Edmonton Green Shopping Centre and SA3.2: Chiswick Road Estate, this includes the Salmon Brook upstream of Deephams Sewage Treatment Works, emphasizing the importance of naturalisation efforts in this area. | The Council acknowledges the importance of highlighting nearby water bodies and will ensure that they are referenced in relevant site allocations. We will also review the place policies, including PL3 – Edmonton Green, to incorporate wording that encourages or requires river restoration and naturalisation, specifically addressing areas such as Salmon Brook upstream of Deephams Sewage Treatment Works. We appreciate the Environment Agency's recommendations and will work to ensure these considerations are reflected in the Local Plan. | Yes | 01926 | Environment Agency |
| **SP PL3: Edmonton Green** | Thames Water highlights that the Edmonton Marshes, part of the Meridian Water Placemaking Plan, contain critical underground infrastructure like strategic water mains and sewers. This area, compulsorily purchased from Thames Water, has protective provisions in the sale agreement to safeguard these assets. They request the supporting text in the PL5 Meridian Water section of the Local Plan to include a reference to the need to protect this strategic underground water/sewerage infrastructure. | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with Thames Water to support responsible development and maintain essential services. | Yes | 01681 | Thames Water |
| **SP PL3: Edmonton Green** | Enfield Climate Action Forum - Air Pollution Working Group's (EnCaf - APWG) response to the Air Quality Assessment (AQA) highlights concerns that the developments proposed in the Draft Local Plan will mostly negatively impact PM2.5 levels, particularly in the most deprived areas of Enfield. Of the 78 locations assessed, only 4 will benefit, while 56, including 14 schools, will experience moderate adverse impacts. EnCaf - APWG criticizes Policy ENV1: Environmental Protection for failing to address the increase in PM2.5 or propose mitigation measures, despite PM2.5 being a recognized harmful pollutant. Additionally, they criticise Policy SC1: Improving Health and Wellbeing, and consider it does not account for the disproportionate impacts on Enfield's deprived areas. EnCaf - APWG proposes that Policy ENV1 be revised to specifically reference PM2.5 as a pollutant requiring special attention and monitoring, include steps to reduce these emissions, and incorporate the Air Quality Positive Guidance for all site allocations. They also suggest that Policy SC1 be updated to include the AQA findings and outline specific measures to protect communities in deprived areas. Furthermore, EnCaf - APWG recommends that special attention be given to improving air quality in the placemaking areas for Edmonton Green (PL3), Angel Edmonton (PL4), and | Enfield Council acknowledges the concerns raised by EnCaf regarding air quality and the impact of proposed developments on PM2.5 and NO2 concentrations. However, the Council's Environmental Protection Policy (ENV1), as outlined in the Enfield Local Plan and supported by evidence from the Integrated Impact Assessment (IIA), provides a comprehensive framework for addressing air quality issues across the borough.<br><br>Addressing PM2.5 and Other Pollutants: The Environmental Protection Policy prioritizes reducing pollution levels and safeguarding air quality, aligning with both national and London-wide standards. The IIA identifies measures aimed at reducing PM2.5 concentrations, including the adoption of sustainable development practices and increased reliance on low-emission technologies. The Council is committed to adopting Air Quality Positive principles, which are incorporated into the planning framework to mitigate air quality impacts at every stage of site development, particularly in vulnerable areas like Edmonton Green and Meridian Water. | No | 02043 | Enfield Climate Action Forum - Air Pollution Working Group (EnCaf - APWG) |

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| | Meridian Water (PL5), as these areas are located in the most deprived parts of Enfield and are near major traffic routes and industrial installations. | Focus on Deprived Areas: The IIA and policy ENV1 recognize that deprived areas of the borough are disproportionately impacted by air pollution. Specific measures are included to address these challenges, such as improving green infrastructure, increasing access to sustainable transport options, and implementing mitigation strategies for developments in these areas. The Council has also emphasized the need to work closely with developers to reduce emissions through the use of green walls, green roofs, and other sustainable design measures, particularly in high-traffic and industrial zones.<br><br>Holistic Approach to Health and Wellbeing: Enfield's policies already integrate health and air quality considerations within the broader context of community wellbeing. Policy SC1: Improving Health and Wellbeing includes provisions for reducing health disparities linked to environmental factors. The Council's ongoing efforts include increasing public awareness, encouraging active travel, and enhancing green spaces to mitigate pollution and improve overall air quality, as highlighted in the IIA.<br><br>Site-Specific Measures: For site allocations like Edmonton Green, Angel Edmonton, and Meridian Water, the Council has proposed specific interventions aimed at reducing air pollution. These areas will benefit from enhanced monitoring, implementation of low-emission zones, and the development of active travel infrastructure that minimizes reliance on motor vehicles, thus directly addressing the air quality issues identified in these high-risk locations.<br><br>In conclusion, the Council's approach is robust and legally compliant, with a clear commitment to reducing air pollution, especially in deprived areas, while supporting sustainable development. The IIA and Policy ENV1 outline clear, actionable measures that address both PM2.5 and NO2 impacts in a targeted and effective manner, ensuring the health and wellbeing of all residents. | | | |
| **SP PL3: Edmonton Green** | Enfield Climate Action Forum - Air Pollution Working Group's (EnCaf - APWG) response to the Air Quality Assessment (AQA) highlights concerns that the developments proposed in the Draft Local Plan will mostly negatively impact PM2.5 levels, particularly in the most deprived areas of Enfield. Of the 78 locations assessed, only 4 will benefit, while 56, including 14 schools, will experience moderate adverse impacts. EnCaf - APWG criticizes Policy ENV1: Environmental Protection for failing to address the increase in PM2.5 or propose mitigation measures, despite PM2.5 being a recognized harmful pollutant. Additionally, they criticise Policy SC1: Improving Health and Wellbeing, and consider it does not account for the disproportionate impacts on Enfield's deprived areas. EnCaf - APWG proposes that Policy ENV1 be revised to specifically reference PM2.5 as a pollutant requiring special attention and monitoring, include steps to reduce these emissions, and incorporate the Air Quality Positive Guidance for all site allocations. They also suggest that Policy SC1 be updated to include the AQA findings and outline specific measures to protect communities in deprived areas. Furthermore, EnCaf - APWG recommends that special attention be given to improving air quality in the placemaking areas for Edmonton Green (PL3), Angel Edmonton (PL4), and Meridian Water (PL5), as these areas are located in the most deprived parts of Enfield and are near major traffic routes and industrial installations. | Enfield Council acknowledges the concerns raised by EnCaf regarding air quality and the impact of proposed developments on PM2.5 and NO2 concentrations. However, the Council's Environmental Protection Policy (ENV1), as outlined in the Enfield Local Plan and supported by evidence from the Integrated Impact Assessment (IIA), provides a comprehensive framework for addressing air quality issues across the borough.<br><br>Addressing PM2.5 and Other Pollutants: The Environmental Protection Policy prioritizes reducing pollution levels and safeguarding air quality, aligning with both national and London-wide standards. The IIA identifies measures aimed at reducing PM2.5 concentrations, including the adoption of sustainable development practices and increased reliance on low-emission technologies. The Council is committed to adopting Air Quality Positive principles, which are incorporated into the planning framework to mitigate air quality impacts at every stage of site development, particularly in vulnerable areas like Edmonton Green and Meridian Water.<br><br>Focus on Deprived Areas: The IIA and policy ENV1 recognize that deprived areas of the borough are disproportionately impacted by air pollution. Specific measures are included to address these challenges, such as improving green infrastructure, increasing access to sustainable transport options, and implementing mitigation strategies for developments in these areas. The Council has also emphasized the need to work closely with developers to reduce emissions through the use of green walls, green roofs, and other sustainable design measures, particularly in high-traffic and industrial zones.<br><br>Holistic Approach to Health and Wellbeing: Enfield's policies already integrate health and air quality considerations within the broader context of community wellbeing. Policy SC1: Improving Health and Wellbeing includes provisions for reducing health disparities linked to environmental factors. The Council's ongoing | No | 02043 | Enfield Climate Action Forum - Air Pollution Working Group (EnCaf - APWG) |

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| | | efforts include increasing public awareness, encouraging active travel, and enhancing green spaces to mitigate pollution and improve overall air quality, as highlighted in the IIA.<br><br>Site-Specific Measures: For site allocations like Edmonton Green, Angel Edmonton, and Meridian Water, the Council has proposed specific interventions aimed at reducing air pollution. These areas will benefit from enhanced monitoring, implementation of low-emission zones, and the development of active travel infrastructure that minimizes reliance on motor vehicles, thus directly addressing the air quality issues identified in these high-risk locations.<br><br>In conclusion, the Council's approach is robust and legally compliant, with a clear commitment to reducing air pollution, especially in deprived areas, while supporting sustainable development. The IIA and Policy ENV1 outline clear, actionable measures that address both PM2.5 and NO2 impacts in a targeted and effective manner, ensuring the health and wellbeing of all residents. | | | |
| **SP PL4: Angel Edmonton** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |
| **SP PL4: Angel Edmonton** | TfL welcomes the addition of the statement in Part 10, which calls for early discussions with TfL on proposals affecting the North Circular Road to assess feasibility and costs. They note that this also applies to the environmental improvements mentioned in Part 12. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL4: Angel Edmonton** | TfL welcomes the changes made in response to their comments, including the addition of cycling infrastructure references in Part 7 and the statement ensuring the bus station's operation remains efficient and at full capacity despite development proposals and traffic changes. They also strongly support the amended statement in Part 8, which requires development proposals to enhance the pedestrian environment and reduce reliance on surface car parks, promoting car-free development. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL4: Angel Edmonton** | The Environment Agency recommends expanding the 'Green Infrastructure' policy in PL4 – Angel Edmonton to 'Green and Blue Infrastructure' to better reflect the significance of watercourses within the area. Additionally, the EA strongly suggests incorporating a standalone policy point on flood risk, given the flood risk issues in Edmonton Green, and adding a specific policy point for groundwater and land quality to address historic contamination. The EA supports the inclusion of wording on the naturalisation and ecological enhancement of waterways and recommends applying this to all place policies with rivers, including PL4. Furthermore, they suggest making a clear distinction between fluvial and surface water flood risks. | The Council welcomes the detailed feedback on Policy PL4 – Angel Edmonton. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |
| **SP PL4: Angel Edmonton** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL4: Angel Edmonton and its sites allocations inlcuding sites SA4.1: Joyce Avenue and Snells Park Estate, SA4.2: Upton Road and Raynham Road, SA4.3: Langhedge Lane Industrial Estate, SA4.4: South-east corner of North Middlesex University Hospital Trust, SA4.4: South-east corner of | The Council acknowledges the importance of referencing nearby water bodies and will ensure that they are incorporated into the relevant site allocations. For Policy PL4: Angel Edmonton, including sites SA4.1 (Joyce Avenue and Snells Park Estate), SA4.2 (Upton Road and Raynham Road), SA4.3 (Langhedge Lane Industrial Estate), SA4.4 (South-east corner of North Middlesex University Hospital Trust), and SA4.5 (Public House, 50-56 Fore Street, London), we will include references to Pymmes Brook upstream of the Salmon Brook confluence. We will also review the place policies to incorporate wording that encourages or requires | Yes | 01926 | Environment Agency |

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| | North Middlesex University Hospital Trust and SA4.5: Public House, 50-56 Fore Street, London this includes Pymmes Brook upstream Salmon Brook confluence. | river restoration and naturalisation, in line with the Environment Agency's recommendations. | | | |
| **SP PL4: Angel Edmonton** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL4: Angel Edmonton and its sites allocations inlcuding sites SA4.1: Joyce Avenue and Snells Park Estate, SA4.2: Upton Road and Raynham Road, SA4.3: Langhedge Lane Industrial Estate, SA4.4: South-east corner of North Middlesex University Hospital Trust, SA4.4: South-east corner of North Middlesex University Hospital Trust and SA4.5: Public House, 50-56 Fore Street, London this includes Pymmes Brook upstream Salmon Brook confluence. | The Council acknowledges the importance of referencing nearby water bodies and will ensure that they are incorporated into the relevant site allocations. For Policy PL4: Angel Edmonton, including sites SA4.1 (Joyce Avenue and Snells Park Estate), SA4.2 (Upton Road and Raynham Road), SA4.3 (Langhedge Lane Industrial Estate), SA4.4 (South-east corner of North Middlesex University Hospital Trust), and SA4.5 (Public House, 50-56 Fore Street, London), we will include references to Pymmes Brook upstream of the Salmon Brook confluence. We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, in line with the Environment Agency's recommendations. | Yes | 01926 | Environment Agency |
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| **SP PL4: Angel Edmonton** | Sport England observes that while the vision for PL4: Angel Edmonton includes new recreation facilities and the Selby Centre's regeneration into a park and sports facilities, the Strategic Policy SP PL4 does not mention sport and recreation facilities. They question whether the policy is sufficient to achieve the vision and recommend it be guided by the council's up-to-date Playing Pitch Strategy or Built Facilities Strategy. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP PL4: Angel Edmonton** | Telereal Securitised Properties GP Limited strongly supports Draft Policy PL4's identification of Angel Edmonton as a Placemaking Plan area, emphasizing the need for investment and flexibility in housing typologies. They advocate for the inclusion of their site at Sterling Way, adjacent to the railway line and Silver Street Overground Station, for residential-led redevelopment, capable of delivering 180-200 homes. They recommend the site be added to Appendix C and Draft Policy | Comments noted. The Council appreciates the comments and support for the Draft Policy PL4. While the council appreciates the potential of Telereal's site for residential-led redevelopment, the current strategic focus and identified sites within the Local Plan are prioritized for meeting housing needs. The council welcomes the opportunity for it to come forward as a windfall site, aligning with our ongoing objective of flexible and sustainable development. | No | 01728 | Telereal Securitised Properties GP Limited |

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| | H1, aligning with the Council's housing needs and strategic vision for Angel Edmonton. | | | | |
| **SP PL4: Angel Edmonton** | Enfield Climate Action Forum - Air Pollution Working Group's (EnCaf - APWG) response to the Air Quality Assessment (AQA) highlights concerns that the developments proposed in the Draft Local Plan will mostly negatively impact PM2.5 levels, particularly in the most deprived areas of Enfield. Of the 78 locations assessed, only 4 will benefit, while 56, including 14 schools, will experience moderate adverse impacts. EnCaf - APWG criticizes Policy ENV1: Environmental Protection for failing to address the increase in PM2.5 or propose mitigation measures, despite PM2.5 being a recognized harmful pollutant. Additionally, they criticise Policy SC1: Improving Health and Wellbeing, and consider it does not account for the disproportionate impacts on Enfield's deprived areas. EnCaf - APWG proposes that Policy ENV1 be revised to specifically reference PM2.5 as a pollutant requiring special attention and monitoring, include steps to reduce these emissions, and incorporate the Air Quality Positive Guidance for all site allocations. They also suggest that Policy SC1 be updated to include the AQA findings and outline specific measures to protect communities in deprived areas. Furthermore, EnCaf - APWG recommends that special attention be given to improving air quality in the placemaking areas for Edmonton Green (PL3), Angel Edmonton (PL4), and Meridian Water (PL5), as these areas are located in the most deprived parts of Enfield and are near major traffic routes and industrial installations. | Enfield Council acknowledges the concerns raised by EnCaf regarding air quality and the impact of proposed developments on PM2.5 and NO2 concentrations. However, the Council's Environmental Protection Policy (ENV1), as outlined in the Enfield Local Plan and supported by evidence from the Integrated Impact Assessment (IIA), provides a comprehensive framework for addressing air quality issues across the borough.<br><br>Addressing PM2.5 and Other Pollutants: The Environmental Protection Policy prioritizes reducing pollution levels and safeguarding air quality, aligning with both national and London-wide standards. The IIA identifies measures aimed at reducing PM2.5 concentrations, including the adoption of sustainable development practices and increased reliance on low-emission technologies. The Council is committed to adopting Air Quality Positive principles, which are incorporated into the planning framework to mitigate air quality impacts at every stage of site development, particularly in vulnerable areas like Edmonton Green and Meridian Water.<br><br>Focus on Deprived Areas: The IIA and policy ENV1 recognize that deprived areas of the borough are disproportionately impacted by air pollution. Specific measures are included to address these challenges, such as improving green infrastructure, increasing access to sustainable transport options, and implementing mitigation strategies for developments in these areas. The Council has also emphasized the need to work closely with developers to reduce emissions through the use of green walls, green roofs, and other sustainable design measures, particularly in high-traffic and industrial zones.<br><br>Holistic Approach to Health and Wellbeing: Enfield's policies already integrate health and air quality considerations within the broader context of community wellbeing. Policy SC1: Improving Health and Wellbeing includes provisions for reducing health disparities linked to environmental factors. The Council's ongoing efforts include increasing public awareness, encouraging active travel, and enhancing green spaces to mitigate pollution and improve overall air quality, as highlighted in the IIA.<br><br>Site-Specific Measures: For site allocations like Edmonton Green, Angel Edmonton, and Meridian Water, the Council has proposed specific interventions aimed at reducing air pollution. These areas will benefit from enhanced monitoring, implementation of low-emission zones, and the development of active travel infrastructure that minimizes reliance on motor vehicles, thus directly addressing the air quality issues identified in these high-risk locations.<br><br>In conclusion, the Council's approach is robust and legally compliant, with a clear commitment to reducing air pollution, especially in deprived areas, while supporting sustainable development. The IIA and Policy ENV1 outline clear, actionable measures that address both PM2.5 and NO2 impacts in a targeted and effective manner, ensuring the health and wellbeing of all residents. | No | 02043 | Enfield Climate Action Forum - Air Pollution Working Group (EnCaf - APWG) |
| **SP PL4: Angel Edmonton** | Enfield Climate Action Forum - Air Pollution Working Group's (EnCaf - APWG) response to the Air Quality Assessment (AQA) highlights concerns that the developments proposed in the Draft Local Plan will mostly negatively impact PM2.5 levels, particularly in the most deprived areas of Enfield. Of the 78 locations assessed, only 4 will benefit, while 56, including 14 schools, will experience moderate adverse impacts. EnCaf - APWG criticizes Policy ENV1: Environmental Protection for failing to address the increase in PM2.5 or propose mitigation measures, despite PM2.5 being a recognized harmful pollutant. Additionally, they criticise Policy SC1: Improving Health and Wellbeing, and consider it does not account for the disproportionate impacts on Enfield's deprived areas. EnCaf - | Enfield Council acknowledges the concerns raised by EnCaf regarding air quality and the impact of proposed developments on PM2.5 and NO2 concentrations. However, the Council's Environmental Protection Policy (ENV1), as outlined in the Enfield Local Plan and supported by evidence from the Integrated Impact Assessment (IIA), provides a comprehensive framework for addressing air quality issues across the borough.<br><br>Addressing PM2.5 and Other Pollutants: The Environmental Protection Policy prioritizes reducing pollution levels and safeguarding air quality, aligning with both national and London-wide standards. The IIA identifies measures aimed at | No | 02043 | Enfield Climate Action Forum - Air Pollution Working Group (EnCaf - APWG) |

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| | APWG proposes that Policy ENV1 be revised to specifically reference PM2.5 as a pollutant requiring special attention and monitoring, include steps to reduce these emissions, and incorporate the Air Quality Positive Guidance for all site allocations. They also suggest that Policy SC1 be updated to include the AQA findings and outline specific measures to protect communities in deprived areas. Furthermore, EnCaf - APWG recommends that special attention be given to improving air quality in the placemaking areas for Edmonton Green (PL3), Angel Edmonton (PL4), and Meridian Water (PL5), as these areas are located in the most deprived parts of Enfield and are near major traffic routes and industrial installations. | reducing PM2.5 concentrations, including the adoption of sustainable development practices and increased reliance on low-emission technologies. The Council is committed to adopting Air Quality Positive principles, which are incorporated into the planning framework to mitigate air quality impacts at every stage of site development, particularly in vulnerable areas like Edmonton Green and Meridian Water.<br><br>Focus on Deprived Areas: The IIA and policy ENV1 recognize that deprived areas of the borough are disproportionately impacted by air pollution. Specific measures are included to address these challenges, such as improving green infrastructure, increasing access to sustainable transport options, and implementing mitigation strategies for developments in these areas. The Council has also emphasized the need to work closely with developers to reduce emissions through the use of green walls, green roofs, and other sustainable design measures, particularly in high-traffic and industrial zones.<br><br>Holistic Approach to Health and Wellbeing: Enfield's policies already integrate health and air quality considerations within the broader context of community wellbeing. Policy SC1: Improving Health and Wellbeing includes provisions for reducing health disparities linked to environmental factors. The Council's ongoing efforts include increasing public awareness, encouraging active travel, and enhancing green spaces to mitigate pollution and improve overall air quality, as highlighted in the IIA.<br><br>Site-Specific Measures: For site allocations like Edmonton Green, Angel Edmonton, and Meridian Water, the Council has proposed specific interventions aimed at reducing air pollution. These areas will benefit from enhanced monitoring, implementation of low-emission zones, and the development of active travel infrastructure that minimizes reliance on motor vehicles, thus directly addressing the air quality issues identified in these high-risk locations.<br><br>In conclusion, the Council's approach is robust and legally compliant, with a clear commitment to reducing air pollution, especially in deprived areas, while supporting sustainable development. The IIA and Policy ENV1 outline clear, actionable measures that address both PM2.5 and NO2 impacts in a targeted and effective manner, ensuring the health and wellbeing of all residents. | | | |
| **SP PL5: Meridian Water** | National Grid has reviewed the Enfield Local Plan and identified that several proposed development sites, including RUR.06 (Land at Picketts Lock), SA5.2 (Meridian Water Phase 2), and SA5.6 (Meridian East - Harbet Road), are crossed or in close proximity to NGET assets. They propose modifications to include site-specific criteria, such as a strategy for responding to NGET overhead transmission lines, ensuring the NGET Design Guide and Principles are applied during masterplanning to reduce the impact through good design. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with National Grid to clarify these points further and ensure mutual understanding and agreement on these matters. | Yes | 01658 | National Grid |
| **SP PL5: Meridian Water** | National Grid has reviewed the Enfield Local Plan and identified that several proposed development sites, including RUR.06 (Land at Picketts Lock), SA5.2 (Meridian Water Phase 2), and SA5.6 (Meridian East - Harbet Road), are crossed or in close proximity to NGET assets. They propose modifications to include site-specific criteria, such as a strategy for responding to NGET overhead transmission lines, ensuring the NGET Design Guide and Principles are applied during masterplanning to reduce the impact through good design. | Comments noted. The Council acknowledges the importance of considering existing utilities in development planning. Clarification will be included in the Statement of Common Ground. The Council is happy to work with National Grid to clarify these points further and ensure mutual understanding and agreement on these matters. | Yes | 01658 | National Grid |
| **SP PL5: Meridian Water** | National Grid has reviewed the Enfield Local Plan and identified that several proposed development sites, including RUR.06 (Land at Picketts Lock), SA5.2 (Meridian Water Phase 2), and SA5.6 (Meridian East - Harbet Road), are crossed or in close proximity to NGET assets. They propose modifications to include site-specific criteria, such as a strategy for responding to NGET overhead transmission lines, ensuring the NGET Design Guide and Principles are applied during masterplanning to reduce the impact through good design. | Comments noted. The Council acknowledges the importance of considering existing utilities in development planning. Clarification will be included in the Statement of Common Ground. The Council is happy to work with National Grid to clarify these points further and ensure mutual understanding and agreement on these matters. | Yes | 01658 | National Grid |

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| **SP PL5: Meridian Water** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |
| **SP PL5: Meridian Water** | The Lee Valley Regional Park Authority (LVRPA) supports the minor amendments to Policy PL5 Meridian Water and its placemaking vision, particularly regarding green corridors, public open spaces, and the naturalisation of waterways. They appreciate the added emphasis on ensuring water sports facilities do not harm ecology and wildlife. Additionally, they endorse the new text requiring development to provide connections through the Regional Park to key destinations, addressing physical severance and promoting attractive and safe walking and cycling links. | Comments noted. The detailed feedback is welcomed. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | No | 01918 | Lee Valley Regional Park Authority |
| **SP PL5: Meridian Water** | The Environment Agency recommends expanding the 'Green Infrastructure' policy in PL5 – Meridian Water to 'Green and Blue Infrastructure' to reflect the significance of the watercourses within the site. They also strongly suggest a standalone policy point on flood risk, given the site's complex flood risk issues, and recommend adding a specific policy point for groundwater and land quality to address historic contamination. The EA supports the wording in Point 8 regarding the naturalisation and ecological enhancement of waterways and recommends incorporating this into other place policies with rivers (PL3, PL4, PL7, PL8, PL9, PL10, and PL11). Additionally, they suggest Point 8 should distinguish between fluvial and surface water flood risks. The EA is pleased with the commitment to a masterplan approach in paragraph 3.68, ensuring consistent infrastructure and flood risk planning across Meridian Water. | The Council welcomes thedetailed feedback on Policy PL5 – Meridian Water. We will consider expanding the 'Green Infrastructure' policy to 'Green and Blue Infrastructure' to better reflect the significance of the watercourses within the site. We will also review the recommendation for a standalone policy point on flood risk and the inclusion of a specific policy point addressing groundwater and land quality, particularly in relation to remediating historic contamination. We appreciate your support for Point 8 and will explore incorporating the suggested wording into other place policies with rivers, as well as ensuring a clear distinction between fluvial and surface water flood risks. The Council is committed to a masterplan approach for Meridian Water, as outlined in paragraph 3.68, to ensure comprehensive infrastructure and flood risk planning. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |
| **SP PL5: Meridian Water** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL5: Meridian Water and its site allocations inlcuding sites SA5.1: Meridian Water Phase 1, SA5.2: Meridian Water Phase 2, SA5.3: Former IKEA store, Glover Drive, SA5.4: Tesco Extra, Glover Drive, SA5.5: Meridian 13 (also known as Teardrop), SA5.6: Meridian East (also known as Harbet Road), SA5.7: Ravenside Retail Park and SA5.8: Kenninghall Metals and Waste - this includes Lea Navigation Enfield Lock to Tottenham Locks, Salmon Brook upstream Deephams STW, Pymmes Brook upstream Salmon Brook confluence and Lea Navigation (Fieldes Weir to Enfield Lock). | The Council acknowledges the importance of highlighting nearby water bodies and will ensure they are referenced in the relevant site allocations. For Policy PL5: Meridian Water, including sites SA5.1 (Meridian Water Phase 1), SA5.2 (Meridian Water Phase 2), SA5.3 (Former IKEA store, Glover Drive), SA5.4 (Tesco Extra, Glover Drive), SA5.5 (Meridian 13/Teardrop), SA5.6 (Meridian East/Harbet Road), SA5.7 (Ravenside Retail Park), and SA5.8 (Kenninghall Metals and Waste), this includes Lea Navigation (Enfield Lock to Tottenham Locks), Salmon Brook upstream of Deephams STW, Pymmes Brook upstream of the Salmon Brook confluence, and Lea Navigation (Fieldes Weir to Enfield Lock). We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | Yes | 01926 | Environment Agency |
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| **SP PL5: Meridian Water** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL5: Meridian Water and its site allocations inlcuding sites SA5.1: Meridian Water Phase 1, SA5.2: Meridian Water Phase 2, SA5.3: Former IKEA store, Glover Drive, SA5.4: Tesco Extra, Glover Drive, SA5.5: Meridian 13 (also known as Teardrop), SA5.6: Meridian East (also known as Harbet Road), SA5.7: Ravenside Retail Park and SA5.8: Kenninghall Metals and Waste - this includes Lea Navigation Enfield Lock to Tottenham Locks, Salmon Brook upstream Deephams STW, Pymmes Brook upstream Salmon Brook confluence and Lea Navigation (Fieldes Weir to Enfield Lock). | The Council acknowledges the importance of highlighting nearby water bodies and will ensure they are referenced in the relevant site allocations. For Policy PL5: Meridian Water, including sites SA5.1 (Meridian Water Phase 1), SA5.2 (Meridian Water Phase 2), SA5.3 (Former IKEA store, Glover Drive), SA5.4 (Tesco Extra, Glover Drive), SA5.5 (Meridian 13/Teardrop), SA5.6 (Meridian East/Harbet Road), SA5.7 (Ravenside Retail Park), and SA5.8 (Kenninghall Metals and Waste), this includes Lea Navigation (Enfield Lock to Tottenham Locks), Salmon Brook upstream of Deephams STW, Pymmes Brook upstream of the Salmon Brook confluence, and Lea Navigation (Fieldes Weir to Enfield Lock). We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | Yes | 01926 | Environment Agency |
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| | Former IKEA store, Glover Drive, SA5.4: Tesco Extra, Glover Drive, SA5.5: Meridian 13 (also known as Teardrop), SA5.6: Meridian East (also known as Harbet Road), SA5.7: Ravenside Retail Park and SA5.8: Kenninghall Metals and Waste - this includes Lea Navigation Enfield Lock to Tottenham Locks, Salmon Brook upstream Deephams STW, Pymmes Brook upstream Salmon Brook confluence and Lea Navigation (Fieldes Weir to Enfield Lock). | includes Lea Navigation (Enfield Lock to Tottenham Locks), Salmon Brook upstream of Deephams STW, Pymmes Brook upstream of the Salmon Brook confluence, and Lea Navigation (Fieldes Weir to Enfield Lock). We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | | | |
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| **SP PL5: Meridian Water** | Sport England notes that while PL5: Meridian Water plans to deliver 10,000 homes, it lacks details on providing new playing fields or enhancing existing ones in the area. They emphasize that significant growth will increase demand for sport and physical activity facilities. Sport England recommends including specific wording to designate space for playing fields, supported by council evidence, to accommodate the population increase. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP PL5: Meridian Water** | London borough Waltham Forest's (LBWF) response to PL5 Meridian Water highlights the opportunity for enhanced recreational facilities at Banbury Reservoir, emphasising the need for improved connectivity between the boroughs, as the reservoir infrastructure is in Waltham Forest and operated by Thames Water. They stress the importance of active travel connectivity for job opportunities and suggest including routes into Haringey and Waltham Forest on the map. Additionally, they recommend ensuring public routes and spaces are safe for women and girls at all times. LBWF calls for collaboration to enhance connectivity and safety measures in the Local Plan to benefit residents across boroughs. | The detailed response regarding Policy PL5 Meridian Water is welcomed. The Council appreciates Waltham Forest's emphasis on enhanced recreational facilities at Banbury Reservoir and the importance of improved connectivity between boroughs. The Council agree on the significance of active travel routes and ensuring safety for women and girls in public spaces. Enfield is committed to collaborating with LBWF, Thames Water, and other stakeholders to enhance connectivity and safety measures. The Council propose establishing a statement of common ground to further discuss and integrate these important aspects into the Local Plan for the benefit of all residents. | No | 02006 | London borough of Waltham Forest |
| **SP PL5: Meridian Water** | Continued cooperation between Waltham Forest and Enfield is crucial for developments within Meridian Water (PL5), including the industrial-led regeneration of Meridian East, the ‘Meridian Hinterlands,’ and adjacent sites. This includes Waltham Forest’s consultation on industrial masterplanning as outlined in paragraph 9.88. Waltham Forest confirms, per paragraph 9.22, that it cannot accommodate industrial capacity to meet Enfield’s identified need. | Enfield Council acknowledges the importance of continued cooperation with Waltham Forest for developments within Meridian Water (PL5), including the industrial-led regeneration of Meridian East and the ‘Meridian Hinterlands.’ The Council appreciate Waltham Forest’s confirmation that it cannot accommodate industrial capacity to meet Enfield’s identified needs, as set out in our Spatial Strategy and Overall Approach Topic Paper and Employment Topic Paper. We look forward to continued collaboration on industrial masterplanning and other cross-boundary developments. | No | 02006 | London borough of Waltham Forest |
| **SP PL5: Meridian Water** | IKEA's comments highlight the importance of the Meridian Water regeneration project, which aims to provide 10,000 homes and 6,000 jobs, supported by significant government funding. The IKEA site is crucial for this development due to its strategic location and accessibility. IKEA has actively participated in the Local Plan process, demonstrating that their site can deliver around 3,000 homes, employment uses, and community infrastructure. They are now in advanced discussions with a national house builder for a mixed-use residential development. The masterplanning confirms the site's suitability for large-scale development. | Comments noted. The Council is committed to working collaboratively with Ikea Properties Investment and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01921 | Ikea Properties Investments Ltd |
| **SP PL5: Meridian Water** | IKEA's comments focus on Site Allocation SA5.3 for their former Meridian Water site. While supporting the principle of residential-led regeneration, IKEA believes the proposed development scale of approximately 1,500 homes is significantly underestimated, leading to inefficient land use. They argue that this misjudgment undermines Enfield Council's housing objectives and contradicts the need to maximize brownfield site use. IKEA highlights the site's potential for greater | Comments noted. The Council is committed to working collaboratively with Ikea Properties Investment and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01921 | Ikea Properties Investments Ltd |

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| | housing delivery, mixed uses, and employment opportunities, advocating for policy modifications to better reflect the site's true capacity and support sustainable redevelopment. | | | | |
| **SP PL5: Meridian Water** | IKEA argues that the Enfield Local Plan's Allocation SA5.3 is not sound as it underestimates the site's development capacity, leading to inefficient use of land. They highlight the lack of alignment with the NPPF, which requires plans to be positively prepared and justified. IKEA emphasizes that the allocation should reflect a realistic assessment of site capacity, advocating for increased housing delivery numbers. They stress the need for modifications to the plan to avoid artificially limiting residential development and express a desire to continue working with Enfield Council to address these concerns. | Comments noted. The Council is committed to working collaboratively with Ikea Properties Investment and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01921 | Ikea Properties Investments Ltd |
| **SP PL5: Meridian Water** | IKEA emphasizes the need for a design-led approach, in line with the NPPF and London Plan, to optimize land use efficiently, especially on brownfield sites. They highlight previous masterplanning efforts showing the site's potential for higher density development and seek modifications to the Local Plan to reflect this capacity accurately. | Comments noted. The Council is committed to working collaboratively with Ikea Properties Investment and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01921 | Ikea Properties Investments Ltd |
| **SP PL5: Meridian Water** | Prologis supports the overall goal of Policy PL5 but raises concerns about new pedestrian, cycle, and vehicle routes potentially disrupting operational industrial and logistics sites. They argue that Figure 3.6 in the Local Plan, which shows green infrastructure and accessibility routes, conflicts with site development and operational needs. Prologis recommends amending Figure 3.6 to remove these annotations to ensure the policy is justified and effective, without compromising the functionality of service yards and vehicle circulation areas. | The council appreciates Prologis' support and acknowledges the concerns regarding the wording of PL5. The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. The SPD only covers the west bank, not the entire of the Meridian Water area. A comprehensive framework, such as a coordinated masterplan, is essential to ensure strategic and coordinated development. This is necessary to bring all stakeholders and provide a clear direction for the area's growth. The presence of multiple stakeholders still requires a coordinated approach to avoid fragmented development and ensure the area's overall vision and objectives are met. | No | 01905 | Prologis for Ravenside Retail Park |
| **SP PL5: Meridian Water** | Prologis finds subparagraph 1 of Policy PL5 confusing and unnecessary, as it mandates a masterplan for the Meridian Water area, including the RRP site. They argue that the existing Meridian Water West SPD, published in June 2023, already serves this purpose. Prologis contends that requiring another masterplan is redundant, could delay development, and lacks clarity on responsibility. They suggest deleting the masterplan requirement from subparagraph 1 to avoid duplication and streamline the policy. | The council appreciates Prologis' support and acknowledges the concerns regarding the wording of PL5. The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. The SPD only covers the west bank, not the entire of the Meridian Water area. A comprehensive framework, such as a coordinated masterplan, is essential to ensure strategic and coordinated development. This is necessary to bring all stakeholders and provide a clear direction for the area's growth. The presence of multiple stakeholders still requires a coordinated approach to avoid fragmented development and ensure the area's overall vision and objectives are met. | No | 01905 | Prologis for Ravenside Retail Park |
| **SP PL5: Meridian Water** | Prologis contends that subparagraph 7 of Policy PL5, which requries 30% of development area as open public space, is too generic and does not account for the operational needs of industrial and logistics uses. They argue that this policy could hinder the viability of such developments and suggest it should specifically apply to residential and other suitable developments. Prologis recommends amending the policy to clarify this distinction, ensuring it does not impact the functionality of industrial and logistics sites. | The council appreciates Prologis' support and acknowledges the concerns regarding the wording of PL5. The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01905 | Prologis for Ravenside Retail Park |
| **SP PL5: Meridian Water** | Prologis supports the policy's aim to generate high-quality permanent jobs but finds the requirement for 25% local labor unclear and potentially onerous. It is uncertain whether this applies to operational or construction jobs, and what is meant by "local labor." Prologis argues that a mandatory local labor target could be difficult to achieve and enforce, potentially discouraging occupiers. They suggest revising the policy to encourage local labor provision without making it an absolute requirement, considering the availability of qualified local workers. | The council appreciates Prologis' support and acknowledges the concerns regarding the wording of PL5. The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01905 | Prologis for Ravenside Retail Park |
| **SP PL5: Meridian Water** | IKEA emphasizes the importance of optimizing housing delivery on brownfield sites, such as their former site at Meridian Water, given the national housing crisis and significant shortfall between Enfield's assessed housing needs (55,000 homes) and the draft Local Plan's target (33,000 homes). They argue that | Comments noted. The Council is committed to working collaboratively with Ikea Properties Investment and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of | No | 01921 | Ikea Properties Investments Ltd |

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| | sustainable brownfield sites should be prioritized over Green Belt releases. IKEA contends that the draft Local Plan underestimates the site's capacity, advocating for a design-led approach to fully realize its potential and contribute effectively to addressing housing needs. | Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SP PL5: Meridian Water** | IKEA's comments on Draft Policy SA5.3 highlight that the site at Meridian Water is not well-suited for large-scale office development, as the demand for offices in this area is weak. Instead, there is strong demand for industrial and logistics uses, particularly given the site's proximity to the North Circular Road. IKEA suggests a more flexible approach to the site's employment uses, allowing for a mix of industrial, logistics, and other employment-generating activities. They argue that the current plan's emphasis on offices is not justified or effective and needs revision to reflect market realities. | Comments noted. The Council is committed to working collaboratively with Ikea Properties Investment and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01921 | Ikea Properties Investments Ltd |
| **SP PL5: Meridian Water** | IKEA seeks to work with Enfield Council to adjust the site's allocation in the Local Plan to reflect its true potential. A number of main and minor modifications are provided within the Rep. | Comments noted. The Council is committed to working collaboratively with Ikea Properties Investment and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01921 | Ikea Properties Investments Ltd |
| **SP PL5: Meridian Water** | IKEA's comments on Allocation SA5.3 argue that the plan is unsound and should be modified to better reflect the site's capacity. They propose that the site can potentially accommodate up to 3,000 new homes, suggesting a minimum baseline of 2,500 homes. They recommend that office space requirements be market-led and allow for other employment uses such as logistics and industry. They also suggest adjusting the delivery trajectory to begin earlier, enhancing the site's role in catalyzing development in Meridian Water. These changes would ensure the plan is sound and effective. | Comments noted. The Council is committed to working collaboratively with Ikea Properties Investment and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01921 | Ikea Properties Investments Ltd |
| **SP PL5: Meridian Water** | Tottenham Hotspur Football Club (THFC) emphasizes its significant investment in the Tottenham area, including a £1bn regeneration project around the new stadium. This investment impacts areas like Meridian Water, where THFC supports balanced development across residential, commercial, social, and community uses. THFC sees the closure of IKEA in Meridian Water as a key redevelopment opportunity and supports the site's allocation for mixed-use, including employment, housing, and community facilities. THFC endorses Site Allocation SA5.6, advocating for its potential to enhance economic and placemaking initiatives. | Support noted. The Council acknowledge THFC's emphasis on the balance of development in Meridian Water and the importance of integrating employment, housing, and community facilities. THFC's suggestions regarding the former IKEA site and the need for a mix of uses to ensure successful placemaking and community building are valuable. | No | 01930 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP PL5: Meridian Water** | The Meridian Water team supports the need for a bespoke placemaking policy given the scale of change at Meridian Water. However, to ensure effectiveness, they suggest minor updates for deliverability over the Plan period. They welcome further dialogue with the LPA to refine the context, placemaking vision, and accompanying Figure 3.6. Proposed changes include:<br><br>* Ensuring office provision at Meridian Water (part 3) is subject to market and viability assessments at the planning application stage for deliverability.<br>* Changing the term 'green loop' to 'green network' (part 6) to better reflect the diversity of open space typologies and their connections.<br>Revisiting the 30% open space minimum requirement at each phase (part 7) to promote a site-wide ambition for comprehensive green infrastructure.<br>* Deleting the requirement for new open spaces on either side of the A406 (part 10) and allowing future masterplanning to determine the appropriate quantum of high-quality, multifunctional open space. | The Council acknowledges the support from the Meridian Water team for the bespoke placemaking policy and the overall ambitions of the draft Enfield Local Plan (ELP). The approach adopted in the ELP, including the 'brownfield first' strategy, is justified and supported by evidence provided in the ELP Spatial Strategy and Overall Approach Topic Paper, Employment Land Review 2024, and the Enfield Employment Topic Paper 2024. These documents collectively demonstrate the strategic direction for delivering high-quality growth, employment opportunities, and enhanced infrastructure within the borough.<br><br>Regarding the specific comments and proposed changes:<br><br>* Office Provision (Part 3): The Council recognizes the need for flexibility in the provision of office space and agrees that market and viability assessments at the planning application stage are crucial for ensuring deliverability.<br>* Terminology (Part 6): The suggestion to use 'green network' instead of 'green loop' is noted and will be considered to better reflect the diversity and connectivity of open spaces within the Meridian Water development.<br>* Open Space Requirement (Part 7): The Council understands the need for flexibility in the open space requirement and will revisit this policy to ensure it aligns with the overall site-wide ambition for comprehensive green infrastructure.<br>* Open Spaces Adjacent to A406 (Part 10): The Council agrees that future masterplanning is the appropriate mechanism to determine the quantum and quality of open spaces, ensuring they meet the needs of the community and align | No | 01945 | Meridian Water (LBE) |

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| | | with strategic objectives.<br><br>The Council is committed to working collaboratively with the Meridian Water team and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SP PL5: Meridian Water** | The Canal & River Trust notes that the section emphasises that the River Lee Navigation (RLN) is central to the new neighborhood, with plans for 'green links' and public realm opportunities. Proposed pedestrian and cycle crossings must consider impacts on the waterway's character, heritage, habitat, safety, and structure. Properly designed access points to the towpath are essential to prevent informal access that could harm visual amenity and structural integrity. Increased towpath use from new crossings requires enhancement plans, and any bridge crossings need agreement and commercial terms with the Trust, adhering to their 'Code of Practice.' The Meridian West Supplementary Planning Document should be referenced for developers and decision-makers. Clarification is needed on the creation of 'canals and waterways' in paragraph 3.71, suggesting replacing 'canals' with 'water channels.' Policy PL5 should acknowledge the limitations of rewilding the RLN due to its navigable function and involve the Trust in plans for water sports facilities and towpath improvements. | The Council appreciate Canal & River Trust's feedback on the River Lee Navigation (RLN) and will ensure consistent references and accurate map representations. Pedestrian and cycle crossings will respect the waterway's character and structure, and properly designed access points will maintain visual and structural integrity. Enhancement plans for increased towpath use and agreements for bridge crossings will follow the 'Code of Practice.' We will reference the Meridian West SPD, clarify terminology by replacing "canals" with "water channels," and acknowledge rewilding limitations in Policy PL5, involving the Trust in relevant plans. Collaboration with Canal & River Trust's will be formalized through a Statement of Common Ground. | No | 02007 | Canal & River Trust |
| **SP PL5: Meridian Water** | The Canal & River Trust notes that paragraph 3 states that projects focused solely on habitat creation, biodiversity net gain, carbon sequestration, or other environmental benefits, especially those for commercial sale, will be resisted unless they provide demonstrable local public benefits. The reasoning for this stance is unclear, and there is no detailed guidance on what constitutes a local public benefit. This could potentially conflict with other policies and aspirations within the Local Plan. | The Council acknowledge the need for clarity regarding what constitutes local public benefits in projects focused on habitat creation, biodiversity net gain, carbon sequestration, or other environmental benefits. To address this, detailed guidance will be developed to define local public benefits, ensuring consistency with other policies and aspirations within the Local Plan. | No | 02007 | Canal & River Trust |
| **SP PL5: Meridian Water** | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) supports the regeneration of Meridian Water but argues that Policy PL5 is not legally compliant or sound, though it could be with major modifications. They emphasize that the Habitats Regulations Assessment (HRA) required by the Conservation of Habitats and Species Regulations 2017 has inadequately assessed the potential impact of the increased housing numbers proposed for PL5 on nearby protected sites, such as the Epping Forest Special Area of Conservation (SAC). The HRA was based on an outdated housing number (5,658 homes) instead of the current projection (6,711 to 10,000 homes), and did not adequately consider the adequacy of new open spaces. Additionally, the ELUWG argues that PL5 does not meet the National Planning Policy Framework (NPPF) requirements for sustainable development, as it lacks sufficient provision for green infrastructure and fails to address the substantial local deficit in open space. They highlight that the proposed new park, Edmonton Marshes, is insufficient in size and quality relative to the needs of the expected population. ELUWG also questions PL5's compliance with the London Plan, which mandates appropriate planning for future open space needs in areas of substantial change. They recommend modifications to ensure that PL5 aligns with national and regional policies, and adequately addresses green space needs. | Comments noted. The council acknowledges the EnCaf Land Use Working Group's concerns about the Epping Forest SAC and the PL5 Meridian Water development. The Council commits to updating the Habitats Regulations Assessment with current data, ensuring sufficient open space in PL5, and refining mitigation measures, including enhancements at Kenninghall Open Space. The Council confirms that the Enfield Local Plan complies with national policies, legilsation, and the London Plan, and we pledge ongoing dialogue with stakeholders to protect the SAC while balancing development needs. For detailed evidence, please refer to the Recreational Mitigation Strategy which sets out the mitigation agreed with Natural England. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **SP PL5: Meridian Water** | Better Homes Enfield raises significant concerns about the Enfield Local Plan (ELP) in relation to Meridian Water, specifically criticizing Policy PL5. The group argues that the plan does not adequately optimize the housing potential of key sites within Meridian Water, falling short of what is possible according to the London Plan. For instance, while PL5 allocates 6,711 homes within the plan period, the document suggests that these sites could realistically deliver up to 9,281 homes, plus additional student accommodation. It also points out that specific site allocations, such as SA5.5 (Meridian 13) and SA5.3 (Former IKEA store), have lower housing numbers than feasible, which undermines the strategic | Comments noted. The detailed feedback on policy PL5. It is important to note that policies within the Enfield Local Plan need to be read as a whole rather than in isolation. This integrated approach ensures comprehensive planning and development. Better Homes Enfield's concerns about housing numbers, affordable housing, open space, active travel, employment targets, and monitoring mechanisms are noted. The policies in the Plan collectively address these areas, ensuring alignment with the London Plan and national policies. | Yes | 01708 | Better Homes Enfield |

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| | objective of maximizing housing supply on brownfield land, especially in proximity to transport hubs like the Meridian Water railway station. The critique further highlights a lack of clarity regarding affordable housing targets and housing mix, which are essential to meeting local needs, as required by both the National Planning Policy Framework (NPPF) and the London Plan. The group recommends several modifications to make Policy PL5 sound and compliant with national and regional policies. These include revising site allocations to better reflect their true housing potential, clearly articulating affordable housing targets and housing mix requirements, and ensuring adequate provision of open spaces, allotments, and recreational facilities as per the standards set out in the Blue and Green Strategy and the draft ELP. Additionally, the document calls for better connectivity between different parts of the Meridian Water site, especially those separated by major roads like Meridian Way, and more detailed information on how the proposed employment targets will be met and monitored. The document emphasizes the need for clear, measurable Key Performance Indicators (KPIs) to track the delivery of housing, open spaces, and jobs, ensuring that the plan's objectives are met and that local residents benefit from the development. | | | | |
| **SP PL5: Meridian Water** | The Enfield Society's response to Policy PL5 on Meridian Water emphasizes that the policy should explicitly include the planned 2,095 dwellings and clearly state its mixed-use nature. They argue that exceptional circumstances justify residential development on Strategic Industrial Land if no other brownfield sites meet housing needs. Additionally, the policy should address Gypsy and Traveller accommodation needs, reflecting Edmonton's historical context. The integration of green/blue spaces and a new local center aligns with the London Plan Policy T1, contrasting with the dormitory suburbs proposed for Chase Park and Crews Hill. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL5: Meridian Water** | Enfield Climate Action Forum - Air Pollution Working Group's (EnCaf - APWG) response to the Air Quality Assessment (AQA) highlights concerns that the developments proposed in the Draft Local Plan will mostly negatively impact PM2.5 levels, particularly in the most deprived areas of Enfield. Of the 78 locations assessed, only 4 will benefit, while 56, including 14 schools, will experience moderate adverse impacts. EnCaf - APWG criticizes Policy ENV1: Environmental Protection for failing to address the increase in PM2.5 or propose mitigation measures, despite PM2.5 being a recognized harmful pollutant. Additionally, they criticise Policy SC1: Improving Health and Wellbeing, and consider it does not account for the disproportionate impacts on Enfield's deprived areas. EnCaf - APWG proposes that Policy ENV1 be revised to specifically reference PM2.5 as a pollutant requiring special attention and monitoring, include steps to reduce these emissions, and incorporate the Air Quality Positive Guidance for all site allocations. They also suggest that Policy SC1 be updated to include the AQA findings and outline specific measures to protect communities in deprived areas. Furthermore, EnCaf - APWG recommends that special attention be given to improving air quality in the placemaking areas for Edmonton Green (PL3), Angel Edmonton (PL4), and Meridian Water (PL5), as these areas are located in the most deprived parts of Enfield and are near major traffic routes and industrial installations. | Enfield Council acknowledges the concerns raised by EnCaf regarding air quality and the impact of proposed developments on PM2.5 and NO2 concentrations. However, the Council's Environmental Protection Policy (ENV1), as outlined in the Enfield Local Plan and supported by evidence from the Integrated Impact Assessment (IIA), provides a comprehensive framework for addressing air quality issues across the borough.<br><br>Addressing PM2.5 and Other Pollutants: The Environmental Protection Policy prioritizes reducing pollution levels and safeguarding air quality, aligning with both national and London-wide standards. The IIA identifies measures aimed at reducing PM2.5 concentrations, including the adoption of sustainable development practices and increased reliance on low-emission technologies. The Council is committed to adopting Air Quality Positive principles, which are incorporated into the planning framework to mitigate air quality impacts at every stage of site development, particularly in vulnerable areas like Edmonton Green and Meridian Water.<br><br>Focus on Deprived Areas: The IIA and policy ENV1 recognize that deprived areas of the borough are disproportionately impacted by air pollution. Specific measures are included to address these challenges, such as improving green infrastructure, increasing access to sustainable transport options, and implementing mitigation strategies for developments in these areas. The Council has also emphasized the | No | 02043 | Enfield Climate Action Forum - Air Pollution Working Group (EnCaf - APWG) |

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| | | need to work closely with developers to reduce emissions through the use of green walls, green roofs, and other sustainable design measures, particularly in high-traffic and industrial zones.<br><br>Holistic Approach to Health and Wellbeing: Enfield's policies already integrate health and air quality considerations within the broader context of community wellbeing. Policy SC1: Improving Health and Wellbeing includes provisions for reducing health disparities linked to environmental factors. The Council's ongoing efforts include increasing public awareness, encouraging active travel, and enhancing green spaces to mitigate pollution and improve overall air quality, as highlighted in the IIA.<br><br>Site-Specific Measures: For site allocations like Edmonton Green, Angel Edmonton, and Meridian Water, the Council has proposed specific interventions aimed at reducing air pollution. These areas will benefit from enhanced monitoring, implementation of low-emission zones, and the development of active travel infrastructure that minimizes reliance on motor vehicles, thus directly addressing the air quality issues identified in these high-risk locations.<br><br>In conclusion, the Council's approach is robust and legally compliant, with a clear commitment to reducing air pollution, especially in deprived areas, while supporting sustainable development. The IIA and Policy ENV1 outline clear, actionable measures that address both PM2.5 and NO2 impacts in a targeted and effective manner, ensuring the health and wellbeing of all residents. | | | |
| **SP PL5: Meridian Water** | Enfield Climate Action Forum - Air Pollution Working Group's (EnCaf - APWG) response to the Air Quality Assessment (AQA) highlights concerns that the developments proposed in the Draft Local Plan will mostly negatively impact PM2.5 levels, particularly in the most deprived areas of Enfield. Of the 78 locations assessed, only 4 will benefit, while 56, including 14 schools, will experience moderate adverse impacts. EnCaf - APWG criticizes Policy ENV1: Environmental Protection for failing to address the increase in PM2.5 or propose mitigation measures, despite PM2.5 being a recognized harmful pollutant. Additionally, they criticise Policy SC1: Improving Health and Wellbeing, and consider it does not account for the disproportionate impacts on Enfield's deprived areas. EnCaf - APWG proposes that Policy ENV1 be revised to specifically reference PM2.5 as a pollutant requiring special attention and monitoring, include steps to reduce these emissions, and incorporate the Air Quality Positive Guidance for all site allocations. They also suggest that Policy SC1 be updated to include the AQA findings and outline specific measures to protect communities in deprived areas. Furthermore, EnCaf - APWG recommends that special attention be given to improving air quality in the placemaking areas for Edmonton Green (PL3), Angel Edmonton (PL4), and Meridian Water (PL5), as these areas are located in the most deprived parts of Enfield and are near major traffic routes and industrial installations. | Enfield Council acknowledges the concerns raised by EnCaf regarding air quality and the impact of proposed developments on PM2.5 and NO2 concentrations. However, the Council's Environmental Protection Policy (ENV1), as outlined in the Enfield Local Plan and supported by evidence from the Integrated Impact Assessment (IIA), provides a comprehensive framework for addressing air quality issues across the borough.<br><br>Addressing PM2.5 and Other Pollutants: The Environmental Protection Policy prioritizes reducing pollution levels and safeguarding air quality, aligning with both national and London-wide standards. The IIA identifies measures aimed at reducing PM2.5 concentrations, including the adoption of sustainable development practices and increased reliance on low-emission technologies. The Council is committed to adopting Air Quality Positive principles, which are incorporated into the planning framework to mitigate air quality impacts at every stage of site development, particularly in vulnerable areas like Edmonton Green and Meridian Water.<br><br>Focus on Deprived Areas: The IIA and policy ENV1 recognize that deprived areas of the borough are disproportionately impacted by air pollution. Specific measures are included to address these challenges, such as improving green infrastructure, increasing access to sustainable transport options, and implementing mitigation strategies for developments in these areas. The Council has also emphasized the need to work closely with developers to reduce emissions through the use of green walls, green roofs, and other sustainable design measures, particularly in high-traffic and industrial zones.<br><br>Holistic Approach to Health and Wellbeing: Enfield's policies already integrate health and air quality considerations within the broader context of community wellbeing. Policy SC1: Improving Health and Wellbeing includes provisions for reducing health disparities linked to environmental factors. The Council's ongoing efforts include increasing public awareness, encouraging active travel, and enhancing green spaces to mitigate pollution and improve overall air quality, as highlighted in the IIA.<br><br>Site-Specific Measures: For site allocations like Edmonton Green, Angel | No | 02043 | Enfield Climate Action Forum - Air Pollution Working Group (EnCaf - APWG) |

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| | | Edmonton, and Meridian Water, the Council has proposed specific interventions aimed at reducing air pollution. These areas will benefit from enhanced monitoring, implementation of low-emission zones, and the development of active travel infrastructure that minimizes reliance on motor vehicles, thus directly addressing the air quality issues identified in these high-risk locations.<br><br>In conclusion, the Council's approach is robust and legally compliant, with a clear commitment to reducing air pollution, especially in deprived areas, while supporting sustainable development. The IIA and Policy ENV1 outline clear, actionable measures that address both PM2.5 and NO2 impacts in a targeted and effective manner, ensuring the health and wellbeing of all residents. | | | |
| **SP PL6: Southgate** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |
| **SP PL6: Southgate** | Historic England considers the current wording of Policy PL6 to be unsound. While they welcome the inclusion of Clause 2, which requires new development to preserve key views of the Grade II* listed tube station, the policy should also ensure that the conservation of this significant heritage asset is appropriately addressed. In particular, the policy should reference the station's significance to ensure its heritage value is fully protected. To improve the policy's soundness, Historic England recommends amending Clause 2 to: "…development that preserves and enhances the significance of the station, including key views." This revision would ensure that the policy not only protects important views but also promotes the conservation and enhancement of the station's historic significance. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SP PL6: Southgate** | TfL welcomes Part 7, which states that development proposals "should contribute towards improving and enhancing cycling and pedestrian accessibility to support sustainable travel patterns." | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL6: Southgate** | LB Barnet supports LB Enfield's Policy PL6, which acknowledges the importance of Southgate Town Centre, a portion of whose catchment lies within Barnet. While Barnet backs the renewal efforts, they stress the need to consider the impact on the character of the adjacent low-rise suburban housing, much of which is within LB Barnet. They note that the form and siting of tall buildings should be a key consideration, which is not fully clarified in Policy PL6 of the Reg 19 draft Local Plan. Barnet welcomes the proposal for a coordinating plan, potentially as a Supplementary Planning Document (SPD), to support Southgate's placemaking vision but recommends that the design impact on neighboring areas in both LB Barnet and LB Enfield be explicitly considered, in line with the town centre hierarchy identified in the London Plan. | The Council appreciate LB Barnet's support for the renewal of Southgate Town Centre and acknowledge their concerns regarding the impact on the adjacent low-rise suburban housing. Policy PL6 emphasizes the importance of coordinated planning, which may include an SPD to support Southgate's placemaking vision. The Council will ensure that the design impact on neighboring areas within both LB Barnet and LB Enfield is carefully considered, particularly concerning tall buildings. This approach aligns with our evidence base on design and character, ensuring that new developments respect and enhance the existing urban context. Further engagement will be pursued to address these cross-boundary considerations effectively. | No | 02091 | London borough of Barnet |
| **SP PL6: Southgate** | Savills, on behalf of Asda, supports the Placemaking Vision for Southgate as a thriving District Centre and the specific policy for Southgate, including the identification of Asda's store within the District Centre boundary. They recommend clarifying Figure 3.7 to avoid ambiguity. While supporting enhancements to the pedestrian environment and reducing surface car parks, Savills emphasizes the need for appropriate vehicular parking for food shopping. They also suggest amending Strategic Policy TC2 to include "where appropriate to do so" for Criteria 2 requirements, acknowledging that minor developments might not contribute to all | The council welcomes Asda's support of the Placemaking Vision for Southgate and the specific policy for Southgate. The council appreciate their feedback on Figure 3.7 and will ensure it is clarified to avoid ambiguity. The council acknowledge the importance of appropriate vehicular parking for food shopping and will consider this in our policies. The council will amend Strategic Policy TC2 to include "where appropriate to do so" for Criteria 2 requirements to reflect the nature of minor developments. The approach aligns with Enfield's commitment to sustainable development and community-focused planning as outlined in the ELP | Yes | 01732 | Asda Stores Ltd |

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| | policy matters. Additionally, Asda welcomes engaging with the Council on a future SPD to support the placemaking vision. | Spatial Strategy and Overall Approach Topic Paper. The council welcome further engagement with Asda on developing the future SPD to support our placemaking vision. | | | |
| **SP PL6: Southgate** | The Enfield Society's concerns regarding Policy PL6 for Southgate highlight the need to distinguish between Southgate Circus and Southgate Green, both Conservation Areas with different characters. They find the term "responding positively" in paragraph 1 unclear. They argue that while preserving key views of the Grade II* listed station is crucial, it is insufficient to protect its significance fully. The Society also questions the justification for a generalized policy supporting high-density development based on a specific appeal decision for Southgate Office Village. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL6: Southgate** | The Councillor for Southgate Ward highlighted a contradiction in the Plan, which suggests removing office space at Southgate Office Village as set out in PL6 to create more homes, while simultaneously advocating for increased office space and commercial units in Southgate for a nighttime economy. They noted that this inconsistency has fueled ongoing resident opposition and remains a contentious issue despite the planning application's prior approval. | Comments noted. The Local Plan is based on up to date evidence. | No | 01836 | Cllr Morreale |
| **SP PL6: Southgate** | The Councillor for Southgate Ward expressed concerns that Policy PL5 allows buildings up to 30 meters high, which contrasts sharply with Southgate's existing low-density, low-rise houses. They emphasised that this would drastically alter the skyline and overall image of Southgate, negatively impacting views and the setting of the historic Charles Holden-designed station. | Comments noted. The Local Plan identifies that tall buildings may be appropriate in specified strategic locations, including town centres. This approach is supported so to make best use of land in a sustainable location and to reflect the evolving character of this town centre. The Council's approach is consistent with London Plan Policy D3 which seeks to ensure that site capacity is optimised through the design-led approach, particularly in well-connected locations. Policy is considered sound and compliant with aims of the NPPF particularly those relating to the protection and conservation of the Natural Environment. | No | 01836 | Cllr Morreale |
| **SP PL6: Southgate** | The Councillor for Southgate Ward noted that the policy's emphasis (PL5) on prioritising active travel and car-free development has sparked outrage among residents. They highlighted particular concerns from disabled residents about the challenges this poses to their mobility and ability to navigate the borough. | Comments noted. The aim of prioritizing active travel and reducing car dependency is to create a more sustainable, healthy, and accessible urban environment for all residents. However, we understand that these changes must be implemented in a way that does not disadvantage those with mobility challenges. The Local Plan incorporates specific measures to ensure that the needs of disabled residents are met. This includes: Enhanced Accessibility: The Council is committed to ensuring that all new developments are designed to be fully accessible, with suitable provisions for disabled residents such as wider pavements, ramped access, and well-maintained crossing points. Inclusive Transport Planning: The plan includes provisions for improving accessible public transportation options and infrastructure. This will include increasing the availability of accessible buses and enhancing connections between key areas of the borough to ensure that disabled residents can navigate easily. Review and Adaptation: The Local Plan will include mechanisms for ongoing review and adaptation based on community feedback and evolving needs to ensure that accessibility remains a top priority. | No | 01836 | Cllr Morreale |
| **SP PL7: New Southgate** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |

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| **SP PL7: New Southgate** | The Environment Agency recommends expanding the 'Green Infrastructure' policy in PL7 – New Southgate to 'Green and Blue Infrastructure' to better reflect the significance of watercourses within the area. Additionally, the EA strongly suggests incorporating a standalone policy point on flood risk, given the flood risk issues in Edmonton Green, and adding a specific policy point for groundwater and land quality to address historic contamination. The EA supports the inclusion of wording on the naturalisation and ecological enhancement of waterways and recommends applying this to all place policies with rivers, including PL7. Furthermore, they suggest making a clear distinction between fluvial and surface water flood risks. | The Council welcomes the detailed feedback on Policy PL7 – New Southgate. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |
| **SP PL7: New Southgate** | LB Barnet's comments highlight the regeneration potential of New Southgate, now designated as an Opportunity Area in the London Plan 2021. The Statement of Common Ground between LB Barnet and LB Enfield recognizes the ambitious regeneration efforts, including potentially decking over or tunneling sections of the North Circular near New Southgate Station. Policy PL7 in Enfield's draft Local Plan calls for a master-planned approach to key sites like the former Gasholder, Topps Tiles, and Aldi, ensuring appropriate distribution of green spaces, non-residential uses, and height and density. It also emphasizes cross-boundary cooperation with Barnet to align with Barnet's policy GSS09. Policy PL7 further addresses air quality and noise pollution by recommending strategic placement of living spaces away from the North Circular and improving links to train and tube stations with active routes. | The Council acknowledge LB Barnet's recognition of New Southgate's regeneration potential and its designation as an Opportunity Area in the London Plan 2021. Enfield's draft Local Plan, particularly Policy PL7, aligns with this vision by advocating for a comprehensive, master-planned approach to development. This includes strategic placement of living spaces to address air quality and noise pollution, enhancing links to transport hubs, and improving the area's relationship with the North Circular Road. We emphasize our commitment to cross-boundary cooperation with Barnet, ensuring alignment with Barnet's local plan policy GSS09. Further engagement and a statement of common ground will be pursued to address these issues collaboratively. | No | 02091 | London borough of Barnet |
| **SP PL7: New Southgate** | LB Barnet comments that Policy PL7 "New Southgate" in Enfield's Reg 19 Draft Local Plan promotes a thriving mixed-use area with dense residential developments and supports tall buildings in select locations, consistent with Policy DM DE6 on Tall Buildings. LB Barnet emphasizes the need for consultation on any proposed tall buildings in New Southgate. However, Barnet's Main Modifications to their draft Local Plan do not designate New Southgate as an area for tall buildings due to insufficient supporting evidence. LB Barnet remains committed to collaborating with LB Enfield to ensure a comprehensive, master-planned approach to New Southgate, in line with Barnet's Policy GSS09. | The Council appreciate LB Barnet's feedback on Policy PL7 and acknowledge the concerns regarding tall buildings in New Southgate. Enfield is committed to a collaborative approach, ensuring alignment with Barnet's Policy GSS09. The Council support the creation of a thriving mixed-use area with carefully considered tall buildings, following a comprehensive, master-planned strategy. We will continue to consult with LB Barnet on proposed developments in New Southgate and are committed to further engagement and a statement of common ground to address these matters effectively. | No | 02091 | London borough of Barnet |
| **SP PL8: Palmers Green** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |
| **SP PL8: Palmers Green** | Historic England recommends that Policy PL8 be revised to include a specific objective aimed at removing Broomfield Park from the Heritage at Risk register. This would align the policy with similar objectives found in other policies, such as Policy PL3 (Edmonton Green), and demonstrate a consistent commitment to heritage conservation across the plan. Historic England recommends the inclusion of an amendment to Policy PL8 to ensure consistency with PL3 by explicitly prioritizing efforts to remove Broomfield Park from the Heritage at Risk register. This revision would strengthen the policy's focus on heritage protection and restoration, ensuring a cohesive approach across the plan in safeguarding significant heritage assets. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SP PL8: Palmers Green** | The NHS London Healthy Urban Development Unit supports additional housing in Palmers Green, noting that development is expected within 5-10 years. They suggest including an additional point on the need to contribute to health provision to emphasize the importance of health and wellbeing. | Comments noted. The Local Plan takes into account all of the infrastructure needs that will be required throughout the Plan period and the Infrastructure Delivery Plan will be continously updated. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care | No | 01872 | NHS London Healthy Urban Development Unit |

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| | | Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SP PL8: Palmers Green** | The Environment Agency recommends expanding the 'Green Infrastructure' policy in PL8 – Palmers Green to 'Green and Blue Infrastructure' to better reflect the significance of watercourses within the area. Additionally, the EA strongly suggests incorporating a standalone policy point on flood risk, given the flood risk issues in Edmonton Green, and adding a specific policy point for groundwater and land quality to address historic contamination. The EA supports the inclusion of wording on the naturalisation and ecological enhancement of waterways and recommends applying this to all place policies with rivers, including PL8. Furthermore, they suggest making a clear distinction between fluvial and surface water flood risks. | The Council welcomes the detailed feedback on Policy PL8 – Palmers Green. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |
| **SP PL8: Palmers Green** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL8: Palmers Green and its site allocations inlcuding sites SA8.1: Morrisons, Palmers Green, SA8.2: Lodge Drive Car Park, SA8.3: Corner of Green Lanes and the North Circular and SA8.4: Travis Perkins, Palmers Green - this includes the Pymmes Brook upstream Salmon Brook confluence and New River. | The Council acknowledges the importance of highlighting nearby water bodies and will ensure they are referenced in the relevant site allocations. For Policy PL8: Palmers Green, including sites SA8.1 (Morrisons, Palmers Green), SA8.2 (Lodge Drive Car Park), SA8.3 (Corner of Green Lanes and the North Circular), and SA8.4 (Travis Perkins, Palmers Green), this includes the Pymmes Brook upstream of the Salmon Brook confluence and the New River. We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | Yes | 01926 | Environment Agency |
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| **SP PL8: Palmers Green** | The Enfield Society's concerns about Policy PL8 for Palmers Green focus on paragraph 5's mention of "respecting key views within Broomfield Park." They argue that this is insufficient to preserve the character of the historic environment and key heritage assets. They particularly highlight that the proposed tall building at 19 Alderman's Hill would likely negatively impact Broomfield Park and the Lakes | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, | No | 01794 | Enfield Society |

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| | Estate Conservation Area, making it inconsistent with national policy and the London Plan regarding the historic environment. | including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | | | |
| **SP PL9: Rural Enfield** | HCC's response highlights several active travel initiatives in Broxbourne that interface with Enfield, including a cycle path along the New River from the M25 to Wormley, active travel improvements for the A10, and several cycle routes around Waltham Cross town centre. HCC welcomes discussions with Enfield to integrate these initiatives with Enfield's active travel connections, aiming to create strategic cycling connections between Hertfordshire, Enfield, and beyond, including those created through development. | Comments noted. The Council appreciates HCC's proactive approach and is keen to collaborate to integrate these initiatives with Enfield's active travel plans. We welcome discussions to create strategic cycling connections between Hertfordshire, Enfield, and beyond, with the aims to enhance connectivity and promote sustainable travel options for our communities. The Council looks forward to engaging with HCC to ensure seamless integration of these important active travel networks. | No | 01755 | Hertfordshire County Council - Highways |
| **SP PL9: Rural Enfield** | The NHS London Healthy Urban Development Unit supports the emphasis on landscape restoration, active travel initiatives, climate resilience initiatives, food growing areas and gardens, eco-tourism and leisure activities, and biodiversity offsetting. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP PL9: Rural Enfield** | The Lee Valley Regional Park Authority (LVRPA) suggests that to ensure the Local Plan is sound, it should include a policy statement supporting the Regional Park and the Park Development Framework. This inclusion is required by the Lee Valley Regional Park Act 1966, which mandates planning authorities like Enfield to integrate Park proposals into their strategies. The Park spans significant areas in Enfield, offering green infrastructure, leisure, and sporting facilities. The LVRPA stresses that Enfield must consult with them on planning applications affecting the Park and adhere to the Park Development Framework's guidelines. | Comments noted. The detailed feedback is welcomed. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | No | 01918 | Lee Valley Regional Park Authority |
| **SP PL9: Rural Enfield** | The Lee Valley Regional Park Authority (LVRPA) supports the inclusion of references to Pickett's Lock in the Local Plan, highlighting its strategic importance and existing leisure facilities. They endorse the updated Rural Enfield Placemaking Vision in Policy PL9, which now includes Pickett's Lock as a hub of sporting excellence. However, LVRPA suggests adding a notation to the Rural Enfield Placemaking Vision map (Fig 3.10) to explicitly identify the 'Lee Valley Leisure Centre at Pickett's Lock' as an existing sports venue and green space with biodiversity value. | Comments noted. The detailed feedback is welcomed. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | No | 01918 | Lee Valley Regional Park Authority |
| **SP PL9: Rural Enfield** | The Environment Agency recommends expanding the 'Green Infrastructure' policy in PL9 – Rural Enfield to 'Green and Blue Infrastructure' to better reflect the significance of watercourses within the area. Additionally, the EA strongly suggests incorporating a standalone policy point on flood risk, given the flood risk issues in Edmonton Green, and adding a specific policy point for groundwater and land quality to address historic contamination. The EA supports the inclusion of wording on the naturalisation and ecological enhancement of waterways and recommends applying this to all place policies with rivers, including PL9. Furthermore, they suggest making a clear distinction between fluvial and surface water flood risks. | The Council welcomes the detailed feedback on Policy PL9 – Rural Enfield. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |
| **SP PL9: Rural Enfield** | Sport England requests evidence to support the proposed improvements for sports excellence at Tottenham Hotspur's training ground in PL9: Rural Enfield. They note that this is not mentioned in the 2018 PPS or the Blue and Green Strategy, questioning the appropriateness of the location for enhancements. They ask for a strategic assessment of the grounds and clarification on which sports will be accommodated for the community. This situation highlights the need for an up-to-date PPS or BFS to justify the requirement for a sports facility and ensure it meets existing or future local sporting needs. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |

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| **SP PL9: Rural Enfield** | The Lee Valley Regional Park Authority (LVRPA) suggests that Policy BG7 requires additional detail to improve its soundness, specifically concerning the Green Belt enhancements. They propose adding explanatory text to clarify the Regional Park's role and its relationship to the Park Development Framework Area Proposals. LVRPA also recommends aligning Policy BG7 with Strategic Policy PL9 Rural Enfield, which supports sporting hubs like Pickett's Lock, and including references to the Regional Park's green and blue infrastructure and strategic leisure provisions to ensure a consistent policy approach. | Comments noted. The detailed feedback is welcomed. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | Yes | 01918 | Lee Valley Regional Park Authority |
| **SP PL9: Rural Enfield** | Enfield Road Watch's response to the local plan's vision for Rural Enfield highlights several concerns. They argue the vision resembles a countryside theme park rather than maintaining Enfield Chase's historic farmland character. The vision's reliance on S106 funding from Green Belt developments is problematic, and the proposed developments, such as Chase Park and Crews Hill, would eliminate existing recreational and ecological benefits. They criticize the lack of clarity and feasibility in the policy, arguing it undermines the rural character, overestimates the area's capacity for high-volume tourism, and depends on harmful developments to fund the vision. Concerns are also raised about active travel initiatives, the future of tenant farms, and unrealistic gateway proposals. | Comments noted. The Rural Enfield vision aims to balance development with the preservation of Enfield's historic and natural character. The proposed developments, including Chase Park and Crews Hill, are essential to meeting housing needs and have been carefully planned to include green and blue infrastructure enhancements, aligning with Enfield's strategic priorities (ELP Spatial Strategy and Overall Approach Topic Paper). The Enfield Housing Topic Paper emphasizes a "brownfield first" approach, but acknowledges that some Green Belt development is necessary to meet the borough's housing targets. This includes efforts to minimize ecological impacts and promote sustainability. The development plans also consider the integration of new amenities and active travel initiatives to enhance accessibility and community benefits, ensuring that these areas continue to provide valuable recreational and ecological resources. Additionally, the proposals for improving green and blue infrastructure, as detailed in the Enfield Housing Topic Paper, aim to enhance public access and recreational opportunities while safeguarding ecological assets. The envisioned active travel initiatives and cultural gateways are designed to reduce car dependency and support sustainable development. The Site Allocation Topic Paper for Regulation 19 outlines the thorough planning and stakeholder consultation processes that have been undertaken to ensure these developments are viable and beneficial for the community, addressing concerns about funding and implementation through S106 agreements. | No | 01687 | Enfield Road Watch |
| **SP PL9: Rural Enfield** | The Bush Hill Park Residents' Association raises concerns about the Rural Area policy, emphasizing that financing for developments in the Green Belt, specifically 5,550 homes at Crews Hill and 3,700 homes at Chase Park, will harm the historic Enfield Chase landscape, as noted on page 90. They highlight ambiguity around the status of Kings Oak Plain and Crews Hill Golf Course, both proposed for removal from the Green Belt. They argue that the policy contradicts the need to preserve the open and historic character of rural Enfield, as developments at Crews Hill and Kings Oak Plain would urbanize the landscape. The association also points out the inappropriate grouping of Enfield Chase with the Lee Valley Regional Park, as increased visitor numbers would necessitate large car parks, harming the sensitive landscape. They express concerns over eco-tourism and leisure proposals, which would require extensive car parking and infrastructure, and emphasize that the focus should be on minimal, low-cost developments like a small visitor center. Finally, they seek clarity on supporting local tenant farming to maintain the historic character of Enfield Chase. | The Enfield Local Plan's spatial strategy and overall approach, detailed in the council's planning evidence base, emphasize the necessity of balancing development with the protection of historical and environmental assets. The plan includes provisions for landscape restoration and the creation of new country parks to compensate for the loss of Green Belt, thereby enhancing public access and environmental quality. Additionally, the plan aims to integrate new developments sensitively within the existing landscape, maintaining the semi-rural character while addressing housing needs. The strategy supports sustainable development, aligning with the London Plan and ensuring that Enfield Chase remains a valued natural and historical asset. This balanced approach ensures that developments are undertaken with careful consideration of their impact, preserving the unique character of the area while meeting broader community and housing objectives. | No | 01759 | Friends of Enfield Chase |
| **SP PL9: Rural Enfield** | The Enfield Society raises concerns about Policy PL9 for Rural Enfield, arguing it misapplies the London Plan and national policies, particularly regarding the preservation of historic landscapes. They emphasize that the policy's approach to integrating rural and urban areas undermines the intrinsic character of Enfield Chase, a post-enclosure farmland landscape. The Society highlights the lack of detailed, evidence-based planning for proposed changes, noting the potential conflict with current agricultural uses and historic landscape values. They also express concern about the viability and prioritization of affordable housing versus rural development projects. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |

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| **SP PL9: Rural Enfield** | The Enfield Society raises several concerns regarding Paragraph 1 of Policy PL9. They argue that the policy is unjustified, particularly concerning the severe adverse impacts on the historic landscapes of Enfield Chase from proposed developments. These developments would damage the form and structure of the Chase, including the loss of the South Walk of Enfield Chase, crucial to Trent Park's setting. They also question the inclusion of Metropolitan Open Land (MOL) references, emphasizing the specific historical value of areas like Old Park and its relation to Enfield Golf Course and Bush Hill Park Golf Course. The Society suggests that the policy should more explicitly address these historical values. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL9: Rural Enfield** | The Enfield Society's concerns with Paragraph 1 of the policy are that it justifies Green Belt developments conflicting with the London Plan and NPPF policies. They argue that the policy's focus on creating a "unique Rural Enfield destination" duplicates the content of Policy BG7, making it redundant. This duplication and lack of clarity could confuse decision-makers, violating NPPF guidelines on policy clarity and conciseness. They suggest that the policy should better integrate with existing frameworks and remove unnecessary repetition. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL9: Rural Enfield** | The Enfield Society supports increasing public access to rural areas but criticizes the policy for linking this objective to unsound Green Belt developments at Chase Park and Crews Hill. They argue that such developments would harm existing pathways like the Merryhills Way, which was established to improve countryside access for areas lacking open space. A 2021 survey highlighted the Way's high value to residents. The Society also notes that the Enfield Chase Restoration area is not easily accessible for local residents and the overall impact would reduce countryside accessibility. They emphasize their long-term work with the Council to maintain a network of paths in the rural area. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL10: Chase Park** | The GLA has significant concerns about the ability of Crews Hill and Chase Park to deliver sustainable neighbourhoods that are not car-dependent. | Comments noted. The release of Green Belt land is justified by exceptional circumstances, including population growth, housing shortages, and economic objectives. This balance between development needs and environmental concerns is detailed in the Green Belt Exceptional Circumstances Topic Paper (Mar-24). The Council emphasizes a vision-led, long-term approach to create successful, non-car-dependent neighbourhoods with critical mass. Releasing more Green Belt land now allows for strategic, sustainable planning, avoiding piecemeal development. The Council has engaged with stakeholders and the public throughout the planning process, demonstrating transparency and accountability. This ongoing consultation recognises our commitment to inclusive planning and community involvement. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP PL10: Chase Park** | The GLA emphasises the need for a robust, masterplanned, and phased implementation strategy to ensure upfront provision of infrastructure and public transport services. Additionally, a realistic funding strategy is crucial to support this delivery and optimise land use. | Comments noted. The release of Green Belt land is justified by exceptional circumstances, including population growth, housing shortages, and economic objectives. This balance between development needs and environmental concerns is detailed in the Green Belt Exceptional Circumstances Topic Paper (Mar-24). The Council emphasizes a vision-led, long-term approach to create successful, non-car-dependent neighbourhoods with critical mass. Releasing more Green Belt land now allows for strategic, sustainable planning, avoiding piecemeal development. The Council has engaged with stakeholders and the public throughout the | No | 00120 | Greater London Authority (GLA) |

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| | | planning process, demonstrating transparency and accountability. This ongoing consultation recognises our commitment to inclusive planning and community involvement. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | | | |
| **SP PL10: Chase Park** | The GLA expresses concerns that the high cost of providing transport infrastructure and services for new, isolated settlements may not be realistic or viable. This could result in car-dependent areas with poor access to essential services and increased pressure on the road network. | Comments noted. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP PL10: Chase Park** | HCC's response on PL 10 (Chase Park urban extension for 3,700 homes) highlights potential impacts on Hertfordshire due to the site's proximity to the Borough of Broxbourne to the northeast and Welwyn Hatfield Borough to the northwest. The Minerals Planning Authority has no concerns about mineral sterilisation, as there are no safeguarded mineral sites near Chase Park. Similarly, the Waste Planning Authority has no concerns, as there are no safeguarded waste management facilities close to the site. | Comments noted. The Enfield Local Plan acknowledges HCC's comments regarding potential impacts on neighboring areas, specifically Broxbourne and Welwyn Hatfield Boroughs, due to the proposed Chase Park urban extension. The Council appreciates the confirmation from the Minerals Planning Authority and the Waste Planning Authority that there are no concerns related to mineral sterilisation or safeguarded waste management facilities near Chase Park. The Council remains committed to ongoing collaboration with Hertfordshire authorities to mitigate any cross-boundary impacts and ensure sustainable development that benefits all involved communities. | No | 01602 | Hertfordshire County Council - Minerals and Waste planning authority |
| **SP PL10: Chase Park** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |
| **SP PL10: Chase Park** | HCC's response notes that Chase Park includes sections of the main river Salmon Brook. Proposals must ensure that upstream areas in Hertfordshire can drain effectively, restricting discharge rates and volumes to greenfield levels and avoiding any reduction in river and flood zone capacity. HCC acknowledges the proposed wider-site SuDS scheme and brook restoration project, recommending early engagement between Enfield LLFA and developers. | Comments noted. The Council will ensure early engagement between Enfield LLFA and developers to address these recommendations. The Council will seek to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and the Environment Agency. | Yes | 01755 | Hertfordshire County Council as Lead Local Flood Authority (LLFA) |
| **SP PL10: Chase Park** | HCC acknowledges the positive sustainable travel principles for Chase Park and commends the aim for a 75% sustainable modal share. However, HCC is concerned about increased vehicular traffic from Chase Park and Crews Hill into Hertfordshire, particularly on routes like Wagon Road, Dancers Hill Road, and Baker Street due to congestion on the M25 and at J24. They suggest strategic mitigation at J24, such as signalization, to keep traffic on appropriate routes and protect Potters Bar residential areas. HCC is willing to discuss these issues further. | Comments noted. HCC's concerns about increased vehicular traffic into Hertfordshire and the potential impacts on routes like Wagon Road, Dancers Hill Road, and Baker Street are understood. Enfield has conducted extensive transport modelling work to address these issues, as detailed in our evidence base. The need for strategic mitigation measures at J24 of the M25 are recognised and are committed to exploring solutions with HCC. The Council is keen to engage further on this matter and will prepare a Statement of Common Ground (SoCG) with HCC to collaboratively address these transportation concerns and ensure the proposed developments align with both Enfield's and Hertfordshire's strategic transport and infrastructure goals. | No | 01755 | Hertfordshire County Council - Highways |
| **SP PL10: Chase Park** | HCC notes the potential implications of the planned urban extensions at Crews Hill and Chase Farm but has no further comments at this time. They emphasise the need for effective cross-boundary collaboration for the Local Nature Recovery Strategy (LNRS) to ensure connectivity of green corridors and woodland creation. | Comments noted. | No | 01755 | Hertfordshire County Council - Sustainability |
| **SP PL10: Chase Park** | HCC's response indicates that both Education and Early Years are reassured by the provisions at the proposed sites at Chase Park and Crews Hill. However, HCC expects Enfield to meet its own needs and clarifies that Hertfordshire will not expand its provision to accommodate demand from outside its area. | Comments noted. | Yes | 01755 | Hertfordshire County Council - Education and Early Years |

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| **SP PL10: Chase Park** | Historic England notes that the intensification of green space use is a likely consequence of the proposed development under Policy PL10. This includes Trent Park, a designated conservation area and registered park and garden. To effectively address the increased pressure on this significant heritage asset, it is crucial that contributions towards a comprehensive management plan be required. Such a plan will ensure that the anticipated rise in usage is carefully managed and any potential impacts are mitigated. Historic England recommends amending Policy PL10 to include a requirement for development proposals to contribute to the preparation and implementation of a management plan for the conservation area and registered park and garden. This amendment will help safeguard the historic and environmental integrity of Trent Park, ensuring its long-term conservation in the face of increased use. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SP PL10: Chase Park** | The NHS London Healthy Urban Development Unit (HUDU) acknowledges the challenge Enfield Council faces in meeting its housing need of 1,246 homes per year. HUDU notes that significant growth is planned for urban extension sites at Chase Park and Crews Hill, with full delivery extending beyond the plan period (2024-2041). These developments are expected to include new local centres with health facilities, but predicting future healthcare needs is challenging given the 20-year timescale. HUDU urges the Council to accommodate changing health priorities and demands over the plan period, considering potential shifts in national priorities or circumstances (e.g., pandemics, new treatments). They recommend ongoing consultation with the Integrated Care Board (ICB) and NHS Trusts, and full engagement with the ICB during master-planning and pre-application processes for major developments to ensure evolving healthcare needs are met. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP PL10: Chase Park** | The NHS London Healthy Urban Development Unit generally supports the allocation of Chase Park. They urge the Council to make provisions for changing health needs and priorities over the long delivery timescale of the site. | Comments noted. The Local Plan takes into account all of the infrastructure needs that will be required throughout the Plan period and the Infrastructure Delivery Plan will be continuously updated. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP PL10: Chase Park** | TfL does not consider the sites at Chase Park (PL10) SA10.1 – SA10.4, Crews Hill (PL11) SA11.1 – SA11.6, land opposite Enfield Crematorium (RUR.01), and land between Camlet Way and Crescent West, Hadley (RUR.02) suitable for housing. This is due to their poor transport connectivity and the high costs required to provide sustainable transport access comparable to urban sites in the borough. Developing these sites is likely to lead to car-dependent development, which is contrary to the Good Growth objectives of the London Plan and the NPPF. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | TfL also highlights the risk of piecemeal development without a coordinated masterplanned approach for infrastructure delivery first, especially since Crews Hill and Chase Park site allocations are listed separately. Releasing greenfield areas alongside urban locations could reduce urban location viability and detract from transport investment there. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | While acknowledging an emerging IDP, TfL cannot support the inclusion of Crews Hill and Chase Park without a realistic Infrastructure Delivery Plan, car parking restraint commitment, and conditions for a coordinated masterplanned approach optimizing density. TfL queries the soundness of the Spatial Strategy under these conditions. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | TfL officers have raised several concerns with Enfield Council regarding the proposed developments at Crews Hill and Chase Park: | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of | No | 01891 | Transport for London |

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| | | Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SP PL10: Chase Park** | TfL officers considers that there is a lack of detail on transport proposals, and the feasibility and costs of providing necessary public transport have been underestimated by Enfield's consultants. A costed and agreed Infrastructure Delivery Plan is absent, which is particularly worrying. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | TfL officers considers there is a need to limit car parking to ensure sustainable travel patterns and support public transport viability. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | TfL officers considers that even with proposed bus services, the Public Transport Accessibility Level (PTAL) at Crews Hill would remain low (1b to a maximum of 3), unlike the higher PTAL areas in the urban parts of the borough. This diminishes the potential for high public transport use and undermines policy part 18e's goal of having all residents within 400 meters of a bus stop. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | Development Feasibility and Impact: There is insufficient detail on the developments' nature, trip generation, and mode share. High car ownership assumptions (1.15 cars per dwelling) contrast sharply with urban areas (0-0.2 cars per dwelling), indicating potential car dependency. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | TfL officers highligjhts the transport modeling predicts significant increases in peak-time traffic on local roads, indicating high delays at network access points. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | TfL considers the absence of a masterplanned approach and the identification of six separate site allocations raise concerns about achieving a comprehensive, integrated development. This could lead to car-dominated development, contrary to the Good Growth objectives of the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | TfL considers the high costs of necessary transport infrastructure for these isolated settlements may jeopardize other priorities like affordable housing and social infrastructure. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | TfL does not consider the sites at Chase Park (PL10) SA10.1 – SA10.4, Crews Hill (PL11) SA11.1 – SA11.6, land opposite Enfield Crematorium (RUR.01), and land between Camlet Way and Crescent West, Hadley (RUR.02) suitable for housing. This is due to their poor transport connectivity and the high costs required to provide sustainable transport access comparable to urban sites in the borough. Developing these sites is likely to lead to car-dependent development, which is contrary to the Good Growth objectives of the London Plan and the NPPF. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | TfL does not consider the sites at Chase Park (PL10) SA10.1 – SA10.4, Crews Hill (PL11) SA11.1 – SA11.6, land opposite Enfield Crematorium (RUR.01), and land between Camlet Way and Crescent West, Hadley (RUR.02) suitable for housing. This is due to their poor transport connectivity and the high costs required to provide sustainable transport access comparable to urban sites in the borough. Developing these sites is likely to lead to car-dependent development, which is contrary to the Good Growth objectives of the London Plan and the NPPF. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| **SP PL10: Chase Park** | TfL does not consider the sites at Chase Park (PL10) SA10.1 – SA10.4, Crews Hill (PL11) SA11.1 – SA11.6, land opposite Enfield Crematorium (RUR.01), and land between Camlet Way and Crescent West, Hadley (RUR.02) suitable for housing. This is due to their poor transport connectivity and the high costs required to provide sustainable transport access comparable to urban sites in the borough. Developing these sites is likely to lead to car-dependent development, which is contrary to the Good Growth objectives of the London Plan and the NPPF. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL10: Chase Park** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL10: Chase Park and its site allocations including: SA10.1: Land at Chase Park, SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west), SA10.3: Chase Park North East and SA10.4: Chase Park North West - this includes Salmon Brook upstream Deephams STW. | The Council acknowledges the importance of referencing nearby water bodies and will ensure they are included in the relevant site allocations. For Policy PL10: Chase Park, including sites SA10.1 (Land at Chase Park), SA10.2 (Arnold House and land to the rear of 66 The Ridgeway), SA10.3 (Chase Park North East), and SA10.4 (Chase Park North West), this includes Salmon Brook upstream of Deephams STW. We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | Yes | 01926 | Environment Agency |
| **SP PL10: Chase Park** | The Environment Agency recommends expanding the ‘Green Infrastructure’ policy in PL10 – Chase Park to ‘Green and Blue Infrastructure’ to better reflect the significance of watercourses within the area. Additionally, the EA strongly suggests incorporating a standalone policy point on flood risk, given the flood risk issues in Edmonton Green, and adding a specific policy point for groundwater and land quality to address historic contamination. The EA supports the inclusion of wording on the naturalisation and ecological enhancement of waterways and recommends applying this to all place policies with rivers, including PL10. Furthermore, they suggest making a clear distinction between fluvial and surface water flood risks. | The Council welcomes the detailed feedback on Policy PL10 – Chase Park. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |
| **SP PL10: Chase Park** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL10: Chase Park and its site allocations including: SA10.1: Land at Chase Park, SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west), SA10.3: Chase Park North East and SA10.4: Chase Park North West - this includes Salmon Brook upstream Deephams STW. | The Council acknowledges the importance of referencing nearby water bodies and will ensure they are included in the relevant site allocations. For Policy PL10: Chase Park, including sites SA10.1 (Land at Chase Park), SA10.2 (Arnold House and land to the rear of 66 The Ridgeway), SA10.3 (Chase Park North East), and SA10.4 (Chase Park North West), this includes Salmon Brook upstream of Deephams STW. We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | Yes | 01926 | Environment Agency |
| **SP PL10: Chase Park** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL10: Chase Park and its site allocations including: SA10.1: Land at Chase Park, SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west), SA10.3: Chase Park North East and SA10.4: Chase Park North West - this includes Salmon Brook upstream Deephams STW. | The Council acknowledges the importance of referencing nearby water bodies and will ensure they are included in the relevant site allocations. For Policy PL10: Chase Park, including sites SA10.1 (Land at Chase Park), SA10.2 (Arnold House and land to the rear of 66 The Ridgeway), SA10.3 (Chase Park North East), and SA10.4 (Chase Park North West), this includes Salmon Brook upstream of Deephams STW. We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | Yes | 01926 | Environment Agency |
| **SP PL10: Chase Park** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman’s property within the development boundary, the reduction of green open space, and the conflict with Enfield’s Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that | Comments noted. The Council is committed to sustainable development that respects our heritage and environment, as supported by its Site Allocation Topic Paper and Spatial Strategy and Overall Approach Topic Paper. These documents emphasize addressing housing shortages, promoting sustainable growth, and enhancing community infrastructure while protecting significant landscapes and biodiversity. Measures will be taken to minimize impacts on pedestrian gateways | No | 00012 | Holmes & Hills LLP |

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| | brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | and tranquility, and efforts will be made to improve public transport connectivity and integrate green spaces and biodiversity enhancements. Regarding the equestrian centre, the council recognize its value and are exploring options to preserve and enhance these facilities. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | | | |
| **SP PL10: Chase Park** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman's property within the development boundary, the reduction of green open space, and the conflict with Enfield's Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |
| **SP PL10: Chase Park** | A map is provided. | Received with thanks. | No | 01741 | Trent Park Golf Club |
| **SP PL10: Chase Park** | Trent Park Golf Club has submitted comments on Policy PL10, highlighting a potential large area of land adjacent to the Chase Park site allocations that could contribute significantly to the local plan's objectives. This land, currently used as an 18-hole golf course, might soon become available due to its declining viability and the club's intention to reduce the course to 9 holes. The Club argues that including this land in the local plan—either as an extension of existing allocations (SA10.1) or as a new allocation (SA10.5)—would enhance the masterplan by allowing for either increased housing or lower density development. This addition could also improve access to public transport and open spaces. They stress that incorporating this land, which was not considered in previous calls for sites, is crucial for the plan's soundness and effectiveness, ensuring it is fully justified and adaptable to new evidence. | Comments noted. The Council is committed to working collaboratively with stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01741 | Trent Park Golf Club |
| **SP PL10: Chase Park** | Fairview supports the Local Plan and the allocation of Chase Park for development. They state there are no significant infrastructure or environmental barriers that could delay the project. Fairview, an experienced house builder, plans to deliver a mix of flatted and family homes, facilitating a quick response to local housing demands. The development is expected to help meet the Borough's housing needs and protect valued landscapes in the area. Fairview supports the council's proactive approach to meeting housing needs but requests more information on the housing target and further clarity. The comments support the Vision for Chase Park and the overall intent of Policy PL10 to create a sustainable new neighborhood with a focus on green infrastructure. However, they suggest several clarifications to enhance the policy's clarity and effectiveness.They note that the current masterplanning framework should not be seen as a strict blueprint but rather as a guiding framework. They recommend rewording Figure 3.2 to emphasize its illustrative nature and inserting a paragraph to clarify this. They also recommend clarifications to figure 3.12, request more flexibility in terms of the site's capacity, and concerns around the prescriptive nature of the some of the requirements. They also suggest lowering the 20% net gain target to 10%, have concerns around the 50% viability requirement and suggest more flexibility is required, and also address concerns around the flexibility of the housing mix policy, and propose various other amendments and clarifications. Overall, the aim is to ensure that the policy is sound and effectively facilitates future planning applications while addressing the need for a comprehensive approach to development. | Support noted. The Council is committed to working collaboratively with stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01746 | Fairview New Homes |
| **SP PL10: Chase Park** | Capel Manor College's comments on Policy PL10 emphasize the need for clarity and effective planning in the Enfield Local Plan. They highlight the current shortfall in housing delivery and the discrepancies in housing targets across documents, | The Enfield Housing Topic Paper (2024) identifies a significant shortfall in housing delivery, exacerbated by discrepancies in housing targets and constraints on available land, including the limited brownfield sites and the necessity for Green | No | 01885 | Capel Manor College |

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| | advocating for a consistent and clear overall requirement. They support the justified release of Green Belt land, such as at Crews Hill, and stress the importance of preparing a comprehensive masterplan rather than just a Supplementary Planning Document (SPD) to ensure timely and coordinated development. Additionally, they call for an Infrastructure Delivery Plan to be integrated into the Local Plan to equitably manage infrastructure costs and support effective site development throughout the plan period. | Belt releases to meet housing needs (Enfield Housing Topic Paper, 2024). The Spatial Strategy and Overall Approach Topic Paper supports this, emphasizing the need for a clear, consistent housing requirement and a stepped trajectory to accommodate the phased delivery of major sites (Spatial Strategy and Overall Approach Topic Paper, 2024). The Chase Park Topic Paper further details the planned comprehensive development of Chase Park, including the provision of around 2,550 homes, a mix of housing types, and enhanced green infrastructure (Chase Park Topic Paper, 2024). This aligns with the broader housing strategy but also highlights the challenges of coordinating development and infrastructure delivery. The Council is supportive of a masterplan, which would integrate strategic and detailed planning, supporting both housing and infrastructure delivery, and resolving the potential delays for the effective realization of Chase Park's development potential, ensuring that housing and infrastructure are aligned with Enfield's overall housing strategy and addressing the identified shortfalls and constraints. | | | |
| **SP PL10: Chase Park** | Capel Manor College generally supports Policy PL10 and the Chase Park Placemaking Area (CPPA) allocation, recognizing its potential to enhance local development. The College owns land behind Arnold House at 66 The Ridgeway, which is now surplus and available for the CPPA. While the land is relatively small, it is crucial for linking The Ridgeway with the new development, facilitating integration with existing residential areas and improving access to amenities. However, the College questions the inclusion of Figure 3.12 in the Local Plan, as it may pre-empt the outcome of the more detailed comprehensive masterplan required by PL10. The College advocates for a detailed masterplan that aligns with the policy requirements, ensuring that planning is informed by a thorough and coordinated approach rather than relying on preliminary illustrative frameworks. | The Council is supportive of a masterplan, which would integrate strategic and detailed planning, supporting both housing and infrastructure delivery, and resolving the potential delays for the effective realization of Chase Park's development potential, ensuring that housing and infrastructure are aligned with Enfield's overall housing strategy and addressing the identified shortfalls and constraints. | No | 01885 | Capel Manor College |
| **SP PL10: Chase Park** | The Diocese supports the placemaking vision for Chase Park noting the opportunity to deliver new homes including affordable family homes and older persons accommodation, and enhanced green and blue infrastructure for the benefit of the community. Part 1 bullet 2 of PL10 states that a more detailed comprehensive masterplan for the placemaking areas must be prepared building on the illustrative framework prepared to date. The individual sites should be able to come forward in accordance with policies in the Local Plan so they are not delayed by the production o the masterplan/spd. PL10 point 13 states the CPPA must come forward ensuring coordination of development between the various sites and with the delivery of infrastructure and services. An SPD will take forward the design concept as well as phasing of the development and a more detailed approach to infrastructure requirements and provision as a whole. The Infrastructure Delivery Plan and associated rates should come forward as part of the Plan so it can be robustly evidenced and to ensure delivery at the earliest. If the IDP and SPD are delayed until after the Plan is adopted, this will result in delay to the delivery of the homes on the site allocation. | Comments noted. The Council is committed to working collaboratively with stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. The Chase Park Topic Paper and Enfield Viability Update both emphasize the need for strategic planning in areas like Chase ParkBoth documents support the necessity of a robust Infrastructure Delivery Plan. The Viability Update confirms that spreading costs fairly and involving stakeholders early ensures that infrastructure supports development without imposing undue financial strain on initial phases. The Council is supportive of a masterplan, which would integrate strategic and detailed planning, supporting both housing and infrastructure delivery, and resolving the potential delays for the effective realization of Chase Park's development potential, ensuring that housing and infrastructure are aligned with Enfield's overall housing strategy and addressing the identified shortfalls and constraints. | No | 01913 | Diocese of London |
| **SP PL10: Chase Park** | Geras Estates Limited and Hebe Developments Limited support Policy PL10 and the Chase Park Placemaking Area, specifically the SA10.2 allocation. They back the Draft Plan's housing strategy, which includes 33,280 new homes over the plan period, recognizing the need to release Green Belt land for development due to insufficient brownfield sites. They highlight their involvement with two key sites: Arnold House and Land to the Rear. Arnold House is a brownfield site with an imminent planning permission for a 95-bed care home, which they support as part of SA10.2. The Land to the Rear, currently Green Belt, is also backed for development, noting its accessibility and integration into the built-up area, despite its current SINC and TPO constraints. They agree with the plan's removal of this land from the Green Belt, seeing it as a logical extension for residential development. Overall, Geras and Hebe are committed to advancing both sites within the Chase Park Placemaking Area and seek to contribute to meeting Enfield's housing needs while adhering to the Draft Plan's vision. | Support noted. | No | 01915 | Geras Estates Limited and Hebe Developments Limited |

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| **SP PL10: Chase Park** | CPRE London opposes the development of Green Belt land at Chase Park (PL10), highlighting that it fulfills all Green Belt purposes and is inappropriate for development. They argue that Enfield has sufficient brownfield land and existing major sites like Meridian Water that should be developed first. CPRE emphasizes that Enfield Chase is a beautiful and historic landscape, and development would significantly harm the area's character and identity. Additionally, the popular Merryhills Public Right of Way and countryside views from local footpaths would be ruined by urbanisation. | Comments noted. The Council acknowledges CPRE London's concerns about the development of Green Belt land at Chase Park (PL10). The Enfield Local Plan is designed to balance housing needs with environmental preservation. The ELP Spatial Strategy and Overall Approach Topic Paper justifies why some Green Belt land must be allocated to meet housing targets sustainably. The Chase Park Topic Paper 2024 details extensive assessments ensuring the developments are planned thoughtfully, considering environmental and community impacts. The plan prioritizes brownfield sites and protects significant green spaces where possible to maintain the area's character and identity. | No | 01726 | CPRE London |
| **SP PL10: Chase Park** | The Herts & Middlesex Wildlife Trust's representation argues that the sites within the Chase Park Placemaking Area have not been adequately assessed for their ecological value. It suggests that the development could significantly harm biodiversity through land use changes and increased recreational pressure. The current assessments do not reflect the potential biodiversity loss, as recent Preliminary Ecological Appraisals indicate that some sites may qualify for Site of Importance for Nature Conservation (SINC) status. The Trust recommends that Policy PL10 be deleted from the Local Plan. Before any development, they call for comprehensive ecological surveys to establish the biodiversity value of the sites and potential SINC designations. These surveys should guide the housing capacity of the site to minimize ecological impact. | The Chase Park Topic Paper (2024) outlines a development strategy that prioritizes balancing housing needs with ecological preservation through a landscape-led approach. The Council commits to conducting detailed ecological assessments before any development, including efforts to enhance biodiversity via new parks, green corridors, and sustainable drainage systems. In response to concerns from the Herts & Middlesex Wildlife Trust about insufficient ecological evaluation, the Local Plan ensures that comprehensive surveys will identify and protect sites of ecological significance, including potential Sites of Importance for Nature Conservation (SINC). These measures, coupled with biodiversity net gain initiatives, ensure that development minimizes ecological impact while addressing housing needs, aligning with both local and national environmental policies. | No | 01852 | Herts & Middlesex Wildlife Trust |
| **SP PL10: Chase Park** | Residents express concerns regarding legal compliance, specifically the clarity of the term "Heritage Asset" in Policies DE4 and DE10. While the incorporation of Historic England's 2019 recommendations is acknowledged, residents urge that the definition in the 'Acronym Buster and Glossary' explicitly include both built and buried heritage resources. For Chase Park (section PL10), residents are worried about the lack of consideration for the likely multi-period buried archaeological resources in the development area, particularly prehistoric archaeology evidenced in other parts of Enfield Chase. They recommend that the Masterplan include a comprehensive archaeological assessment based on fieldwork. Additionally, while welcoming the proposal to create a heritage park at the former Slades Hill army camp and AA gun site, they stress the necessity of full archaeological documentation and possible excavation prior to development for effective site interpretation. | Comments noted. The Council acknowledges the concerns regarding the clarity of the term "Heritage Asset" in Policies DE4 and DE10 and will amend the glossary to include both built and buried heritage resources. For Chase Park, a comprehensive archaeological assessment based on fieldwork will be required in the Masterplan to address potential multi-period archaeological resources. Additionally, full archaeological documentation and necessary excavation will be prerequisites for developing the heritage park at the former Slades Hill army camp and AA gun site, ensuring effective site interpretation. | No | 00002 | Enfield Archaeological Society |
| **SP PL10: Chase Park** | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) supports new homes and employment spaces but argues that Policy PL10 (Chase Park) is not legally compliant or sound. They highlight Enfield's high CO2 emissions from car use and the need for sustainable transport to meet carbon neutrality goals by 2040. PL10's location and development will likely increase car dependency, contrary to the London Plan's objectives. The area has poor public transport accessibility and high car ownership, making it unsuitable for sustainable development. Furthermore, the development does not meet the exceptional circumstances required to justify changes to Green Belt boundaries, and the Plan has not fully utilized brownfield sites or considered alternatives. Concerns are also raised about the viability and deliverability of the project due to inadequate infrastructure cost assessments and stakeholder engagement. Therefore, ELUWG concludes that PL10 Chase Park is unsound and inconsistent with national policies. | Comments noted. The council appreciates the ELUWG's support for new homes and employment spaces and acknowledges their concerns regarding Policy PL10 (Chase Park). The Council recognise the need for sustainable transport to achieve carbon neutrality by 2040 and are committed to improving public transport accessibility in the area. The policy is supported by comprehensive assessments demonstrating exceptional circumstances for Green Belt adjustments, thorough consideration of brownfield sites, and a robust evaluation of infrastructure costs and stakeholder engagement. Detailed justifications can be found in the Chase Park Topic Paper, the ELP Spatial Strategy Topic Paper, and the Exceptional Circumstances Topic Paper. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **SP PL10: Chase Park** | Enfield Road Watch's response to the Local Plan argues that the proposal for Chase Park is unsound due to its disruption of the urban-rural interface, compromising the openness and historic landscape of the Green Belt. They assert that alternative options have not been fully explored and that the development pattern contradicts the London Plan's sustainable growth strategy. They also highlight the lack of community support and potential misinterpretation of national policies, stressing the need for better alignment with strategic planning and protection of high-value landscapes. | Comments noted. Enfield Road Watch's concerns regarding Chase Park's impact on the Green Belt, its openness, and character are acknowledged. However, the Council's plan aligns with strategic priorities and has undergone thorough consultation and cooperation with stakeholders and adjacent authorities to ensure compliance with broader regional goals (Duty to Cooperate Statement). The ELP Spatial Strategy outlines a balanced approach to development, focusing on sustainability and preserving essential green spaces (ELP Spatial Strategy and Overall Approach Topic Paper). Furthermore, the Chase Park Topic Paper highlights the planned green infrastructure and recreational benefits, addressing | No | 01687 | Enfield Road Watch |

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| | | the perceived loss of green space by creating high-quality new parks and open spaces. Additionally, alternatives have been explored and assessed in the Integrated Impact Assessment (IIA), demonstrating a comprehensive evaluation of potential development strategies to ensure the best outcomes for Enfield and its residents. | | | |
| **SP PL10: Chase Park** | Enfield Road Watch acknowledges the proposed extension of Trent Country Park but argues that Vicarage Farm already serves this purpose by preserving the historic landscape and wildlife habitats. They express concerns over the loss of valued views and the impact of urbanization on undulating farmland. They highlight that the topography of SA10.3 discourages active travel, making it likely car-dominated and unsustainable. They also criticize the potential replacement of Trent Park Equestrian Centre with Vicarage Farm, questioning its viability and accessibility. | Comments noted. The Council recognizes the value of Vicarage Farm and its role in extending the historic landscape of Trent Country Park. However, the Chase Park Topic Paper emphasizes that the proposed development aims to enhance green infrastructure and recreational opportunities, creating high-quality parks and open spaces. The development will include measures to protect and enhance the ecological value of the area, addressing concerns about urbanization and loss of views. Additionally, active travel routes and public transport improvements are planned to ensure sustainability and reduce car dependency . | No | 01687 | Enfield Road Watch |
| **SP PL10: Chase Park** | Enfield Road Watch's response to the local plan expresses concerns about the proposed green and blue infrastructure provision in Chase Park. They argue that the current open countryside, accessible via Merryhills Way, offers a higher quality of open space compared to the proposed new principal open space. They emphasize that replacing the existing open countryside with a new open space would be inferior in both quantity and quality, resulting in a loss of the current experience enjoyed by local residents and potential ecological degradation of the SINC. | Comments noted. Enfield Road Watch's concerns about the proposed green and blue infrastructure in Chase Park are addressed in the "Chase Park Topic Paper." The paper outlines the Council's strategy to create new publicly accessible parks and open spaces that enhance existing assets like brooks and heritage sites, and provide expansive views currently unavailable to the public. The new green spaces aim to address the identified deficiency in open space access for existing and future residents while preserving and enhancing the area's ecological and recreational value. The transformation of Merryhills Way into a principal open space will provide significant recreational benefits, connecting communities and enriching local green infrastructure. | No | 01687 | Enfield Road Watch |
| **SP PL10: Chase Park** | Enfield Road Watch's response to the local plan regarding movement and connectivity requirements highlights concerns about the effectiveness of the proposed Transport Strategy 2024. They argue that the strategy lacks specific evidence for Enfield's deliverability and does not meet the London Plan's requirements for reducing car dependency and increasing trips by foot, cycling, or public transport. They emphasize that large developments like Chase Park will struggle to meet these targets, potentially impacting the broader regional goals. The assumptions around car provision and transport modelling are also questioned for their optimism and potential underestimation of traffic impacts. | Comments noted. The Council's Chase Park Topic Paper outlines detailed strategies to enhance movement and connectivity within Chase Park. The paper emphasizes the integration of green and blue infrastructure, promoting active travel, and ensuring sustainable transport options. The plan includes comprehensive measures to improve accessibility, reduce car dependency, and create a well-connected community, aligning with the London Plan's targets for sustainable development. Additionally, the Council's ELP Spatial Strategy and Overall Approach Topic Paper and the Integrated Impact Assessment provide robust evidence supporting the feasibility and effectiveness of these strategies, demonstrating a commitment to meeting regional goals and enhancing the area's transport network. | No | 01687 | Enfield Road Watch |
| **SP PL10: Chase Park** | Enfield Road Watch's response to the local plan critiques the feasibility of walking and cycling provisions in Chase Park. They argue that the area’s topography, narrow footways, and pollution make the proposed connections to local amenities impractical. They highlight that the proposed cycling routes exceed acceptable gradients, making compliance with national standards difficult. Furthermore, they point out the speculative nature of proposed solutions like e-bike rentals and the lack of firm commitments for new bus routes, deeming the plans ineffective for achieving the required modal shift and sustainable transport goals. | Comments noted. The Chase Park Topic Paper highlights planned investments in infrastructure to support sustainable travel, including detailed strategies for enhancing walking and cycling routes in compliance with national standards. Additionally, the Council's ELP Spatial Strategy and Overall Approach Topic Paper emphasizes a balanced approach to development, integrating green infrastructure and connectivity enhancements to facilitate active travel. The Integrated Impact Assessment also supports these strategies by demonstrating their feasibility and alignment with broader regional goals. Furthermore, ongoing collaboration with stakeholders ensures the effective delivery and integration of these transport improvements, addressing ERW's concerns comprehensively. | No | 01687 | Enfield Road Watch |
| **SP PL10: Chase Park** | Enfield Road Watch's response to the local plan raises several concerns about the social and community infrastructure requirements outlined in Paragraph 16. They question the clarity and adequacy of secondary school provisions, noting the importance of easy access by non-car means. The effectiveness of proposed health care facilities is also doubted due to the absence of NHS commitments. Additionally, they argue that using the Vicarage Farm and Rifles site SINC as open space would degrade the habitat, contradicting national and London Plan conservation policies and reducing open space quality for existing residents. | Comments noted. Enfield Road Watch's concerns about social and community infrastructure, particularly secondary schooling, healthcare facilities, and green and blue infrastructure, are acknowledged. The Chase Park Topic Paper and the infrastructure planning documents outline that secondary education will be supported by both existing schools and potential new provisions within the development area, ensuring accessibility. Health care facilities are planned with ongoing discussions with the NHS to secure commitments. The multi-functional network of green and blue infrastructure is designed to integrate with existing ecological features, aiming to enhance habitat connectivity and recreational opportunities while mitigating potential ecological impacts, as set out in the Chase Park Topic Paper and the Infrastructure Planning Evidence Base. | No | 01687 | Enfield Road Watch |

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| **SP PL10: Chase Park** | Enfield Road Watch's response to PL10 Paragraph 5 argues that the proposed figure of 3,700 new homes is not justified. They believe the high-density urban approach is inappropriate for the rural location, particularly given the character of the surrounding South Lodge Estate and the open countryside. They reference the Enfield Characterisation Study, which emphasizes the sensitivity of the urban-rural interface. They contend that such high-density development would undermine the semi-rural quality of the area, which is currently a defining feature, and that it is inconsistent with the London Plan and the NPPF. | Comments noted. The Council's ELP Spatial Strategy and Overall Approach Topic Paper and Chase Park Topic Paper justify the density by outlining a balanced development strategy that integrates green infrastructure, promotes sustainable growth, and aligns with broader regional goals. The Integrated Impact Assessment (IIA) further evaluates alternative approaches, ensuring the chosen strategy effectively meets housing needs while preserving essential open spaces. | No | 01687 | Enfield Road Watch |
| **SP PL10: Chase Park** | Enfield Road Watch raises concerns about the Local Plan's compliance with legal standards, specifically criticizing Paragraph 8 of the policy. They argue that the proposed mix of uses, including a primary school, local center, and employment-generating uses, lacks justification for achieving the 75% London Plan target for non-car travel. They highlight the suburban, car-dependent nature of the area and suggest the plan does not align with the London Plan's focus on developing areas with a good mix of uses like town centers and regeneration sites. They also express doubts about the feasibility of providing sufficient secondary school capacity within the plan. | Comments noted. The Council's Site Allocations Topic Paper supports the mix of uses proposed for Chase Park, aiming for a self-sufficient urban extension. This approach integrates residential, educational, and commercial developments to promote sustainability. Furthermore, the ELP Spatial Strategy and Overall Approach Topic Paper ensures that these developments align with broader regional goals, supporting sustainable growth while meeting day-to-day needs. The Integrated Impact Assessment (IIA) further evaluates alternative approaches, ensuring the chosen strategy effectively meets housing needs while preserving essential open spaces. | No | 01687 | Enfield Road Watch |
| **SP PL10: Chase Park** | Enfield Road Watch's response to the Local Plan raises several concerns about the Urban Design and Layout detailed in Paragraph 12: 1) Clarity for Decision Makers: Paragraph 12a and 12d are criticized for their lack of clear guidance on how decision makers should respond. 2) Topography and Watercourses: The response to the area's topography and historic watercourses is deemed insufficient and repetitive. 3) Density: Paragraph 12f's proposed urban densities are seen as inappropriate for a countryside edge location, contrasting sharply with the South Lodge estate. 4) Setting of Trent Park: Paragraph 12h is disputed because Enfield Chase is considered integral to Trent Park's setting. 5) Heat Network Connection: Paragraph 12i's requirement for all new homes to connect to the Edmonton heat network is seen as unjustified. 6) Traffic: Paragraph 12k's claim about Enfield Road being the gateway is contradicted by transport modeling suggesting Hadley Road will handle most traffic. | Comments noted. The Chase Park Topic Paper sets out the approach based on detailed plans on integrating the development with existing topography and natural features, promoting sustainable density levels, and ensuring connectivity to necessary infrastructure, including heat networks and transport routes. The ELP Spatial Strategy and Overall Approach Topic Paper further elaborates on the balanced approach to development, ensuring it aligns with broader regional goals and sustainability targets. | No | 01687 | Enfield Road Watch |
| **SP PL10: Chase Park** | Enfield Road Watch's concerns about Paragraph 13 of the Local Plan focus on the perceived inadequacy of the proposed replacement of existing open countryside with new principal open spaces. They argue that the current open spaces, especially those accessible via Merryhills Way, provide significant benefits that are protected under London Plan Policy G1. The proposed new spaces are considered inferior, potentially leading to ecological degradation and loss of the valuable countryside experience. | Comments noted. The Council's plan for Chase Park is designed to enhance green and blue infrastructure while addressing deficiencies in access to open space. The Chase Park Topic Paper outlines the strategy to create new publicly accessible parks and open spaces that integrate with existing assets like brooks and provide extraordinary views. This approach is supported by the Integrated Impact Assessment (IIA), which evaluates the sustainability and benefits of these proposals. The new parks and open spaces are intended to be of high quality and provide significant recreational and ecological benefits, enhancing the overall green infrastructure network. | No | 01687 | Enfield Road Watch |
| **SP PL10: Chase Park** | Enfield Road Watch provides an Assessment of Compliance with LTN1/20 Table 5.8. This assessment raises concerns about the suitability of Chase Park for cycling infrastructure as outlined in the Enfield Local Plan. Their main points are as follows: 1) Topographical Challenges: The gradients on key routes connecting Chase Park to nearby destinations like Enfield Town, Oakwood Station, and Chase Farm Hospital are far steeper than the maximum limits set out in Local Transport Note 1/20 (LTN1/20) guidelines for cycling infrastructure. The slopes, which significantly exceed recommended gradients, would discourage cycling, undermining the Mayor's strategic transport goal of achieving 80% of trips by foot, cycle, or public transport by 2041. 2) Non-Conformity with London Plan Policies: The group asserts that the proposed cycling infrastructure does not conform with London Plan Policy T5, which requires removing barriers to cycling and creating environments that encourage active travel. The steep gradients, lack of safe, segregated cycling paths, and problematic road layouts make it unlikely that residents would choose cycling as a viable alternative to cars. 3) Off-Site Challenges: The difficulties extend beyond Chase Park's boundaries, affecting off-site connectivity to important destinations. Improvements in cycling and walking | Comments noted. Enfield's Chase Park Topic Paper (2024) and other evidence provides a justified response, emphasizing the feasibility and strategic alignment of the Chase Park development. 1) Strategic Vision and Sustainable Growth: The Chase Park development is part of Enfield's broader vision to deliver 3,765 new homes, significantly contributing to the borough's housing needs. The plan is deeply rooted in sustainable development principles, aiming to create a vibrant new suburb that integrates high-quality housing with ample green spaces and improved infrastructure. This vision ensures that the area is not just a housing development but a well-rounded community with accessible amenities and transportation links. 2) Placemaking and Infrastructure Enhancements: The Council has recognized the existing challenges, such as topographical gradients, and is committed to addressing these through innovative urban design and infrastructure improvements. Development is supported by a comprehensive placemaking strategy that includes enhancements to walking and cycling routes, ensuring they are safe and accessible for residents. Furthermore, the site design will consider the integration of green infrastructure, enhancing the area's connectivity while respecting the natural landscape. 3) Investment in Cycling and | No | 01687 | Enfield Road Watch |

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| | routes towards locations like Enfield Town and Oakwood Station are unlikely to be feasible, given the terrain and infrastructure limitations. 4) Electric Bike Rental Scheme: While the policy suggests the possibility of introducing an electric bike rental scheme, Enfield Roadwatch considers this speculative and unlikely to contribute significantly to modal shift, citing the failure of similar schemes, including one in Enfield. Their recommendations: 1) Reevaluation of Cycling Strategy: The group recommends that the cycling strategy for Chase Park be reconsidered, as the current proposals are not justified and would not likely create the healthy environment needed for significant numbers of people to choose cycling.<br>Policy Amendments: They suggest that Policy PL10, particularly in reference to cycling, does not conform with the London Plan and needs revision to realistically address these challenges. They argue that without realistic prospects for effective off-site improvements in walking and cycling, the policy should not proceed as currently proposed. In summary, Enfield Roadwatch concludes that the current cycling proposals in Policy PL10 are insufficient to achieve the modal shift required by the London Plan, primarily due to significant topographical constraints. | Active Travel: Enfield's commitment to promoting active travel is evident through its investment in high-quality cycling infrastructure. The Evidence Base for Enfield Local Plan emphasizes the Council's goal to support the development of cycle routes and active travel networks across the borough. While gradients may pose challenges, the Local Plan acknowledges these and proposes solutions, such as creating alternative routes and investing in earthworks to mitigate steep sections. Moreover, the plan considers other forms of sustainable travel, such as electric bike schemes, to encourage cycling in more challenging areas. 4) Adaptation to LTN 1/20 Compliance: The Council is aware of the cycling infrastructure requirements set out in Local Transport Note 1/20 (LTN 1/20) and has committed to ensuring compliance wherever possible. While some routes may not fully meet the ideal gradient specifications, the Council is exploring alternative solutions, such as phased route improvements and earthworks, to ensure safe and practical cycling options. The Chase Park development also aims to balance immediate compliance with longer-term adaptation strategies to ensure cycling remains a viable option. 5) Holistic Transport Strategy: Chase Park's development is part of a holistic transport strategy that extends beyond cycling. The plan also focuses on improving public transport accessibility, pedestrian routes, and car-sharing schemes, which collectively contribute to achieving the London Plan’s ambitious goal of 80% of trips made by foot, cycle, or public transport by 2041. This multi-modal approach ensures that residents have various sustainable travel options, even if cycling presents some challenges in certain areas. Overall, the Council's strategic plan for Chase Park is ambitious and forward-thinking, addressing housing needs while promoting sustainable development. Although Enfield Roadwatch highlights valid concerns about cycling infrastructure, the Council's investment in placemaking, innovative design, and multi-modal transport solutions demonstrate a strong commitment to overcoming these challenges. The plan aligns with the London Plan and national guidance, offering a balanced approach that considers both the immediate and long-term needs of the community. | | | |
| **SP PL10: Chase Park** | Enfield Road Watch provides a Photographic Analysis Enfield Chase A110 Strategic Gap. The document provides a photographic analysis of the Enfield Chase Heritage Area of Special Character and the A110 Strategic Gap. The analysis highlights the importance of this stretch of land as a strategic gap between Oakwood and Enfield Town, emphasizing its contribution to the area's rural character and local identity. Key points from the analysis include: 1) Significance of the Strategic Gap: The openness of the land on both sides of the A110 Enfield Road plays a critical role in maintaining a clear separation between the urban sprawl of metropolitan areas and the surrounding countryside. This gap is integral to preserving the character and identity of the local area. 2) Contribution of Trent Park Equestrian Centre: The equestrian center adds to the rural atmosphere, offering long, uninterrupted views and enhancing perceptions of openness with its rural qualities. 3) Views and Topography: The analysis notes the importance of long-distance rural views, particularly towards landmarks like St. Mary's Church on the Ridgeway. The undulating topography, with slopes and valleys, further contributes to the area's scenic beauty and rural feel. 4) Historical Significance: The A110 stretch retains a rural character that is one of the last remaining links to the historic county of Middlesex, making its preservation crucial. Overall, Enfield Road Watch suggests that any future development should carefully consider the preservation of the A110 Strategic Gap. They recommend maintaining the openness and rural character of the area to prevent urban sprawl and to protect the historical and scenic value of the Enfield Chase Heritage Area. | Comments noted. The Chase Park Topic Paper (2024) provides a detailed justification for the development proposals in the context of preserving the A110 Strategic Gap and addressing the concerns raised by Enfield Road Watch. 1) Balancing Development with Green Spaces: The Chase Park development is carefully designed to balance new housing with the preservation of green spaces. The Council acknowledges the significance of the A110 Strategic Gap, emphasizing its role in maintaining the character of the area. However, the plan also recognizes the pressing need for housing, and Chase Park is part of a broader strategy to address this demand while safeguarding important green spaces. 2) Integration of Open Spaces: The development will include extensive open spaces and green corridors that respect the area's rural character. These green spaces are designed to act as buffers between new housing and the surrounding countryside, ensuring that the views and rural atmosphere cherished by Enfield Road Watch are preserved. The plan aims to integrate these natural features into the development, creating a harmonious relationship between the built environment and the landscape. 3) Transport and Connectivity Enhancements: The Local Plan’s transport strategy includes improvements to walking and cycling routes, which will be designed to enhance connectivity while minimizing impact on the natural landscape. These enhancements will provide better access to green spaces and ensure that residents have sustainable travel options. This addresses the concern about the Strategic Gap by improving access without significantly altering the character of the area. 4) Respect for Heritage: The development will respect the historical significance of the area, particularly its connection to the heritage of Middlesex. While some development is necessary to meet housing targets, the plan includes measures to protect important views, such as those towards St. Mary’s Church, and to maintain the rural feel of the area. The integration of heritage-sensitive design principles ensures that the area's history is honored while accommodating growth(<br>Enfield Council. Overall, The Council's approach to Chase Park balances the need for new housing with the preservation of the rural character and strategic | No | 01687 | Enfield Road Watch |

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| | | importance of the A110 gap. Through careful design, integration of green spaces, and transport enhancements, the plan ensures that development will not compromise the area's openness or historical significance, addressing the concerns raised by Enfield Road Watch while fulfilling the borough's growth needs. | | | |
| **SP PL10: Chase Park** | Enfield RoadWatch, expresses concerns about Policy PL10, Paragraph 13 of the Enfield Local Plan 2019-2041. The key issue is the plan's proposal to replace the Merryhills Way open countryside with new green and blue infrastructure, which is considered inferior in both quality and accessibility. The representation argues that this contradicts the preservation of high-quality open spaces as outlined in the London Plan and could lead to ecological degradation of the Site of Importance for Nature Conservation (SINC). The recommendation is to delete Paragraph 13 to ensure the Local Plan aligns with the NPPF and the London Plan's policies on green infrastructure and the protection of open spaces. | Comments noted. Enfield's Chase Park Topic Paper (2024) and other evidence provides a justified response, emphasizing the feasibility and strategic alignment of the Chase Park development. 1) Strategic Vision and Sustainable Growth: The Chase Park development is part of Enfield's broader vision to deliver 3,765 new homes, significantly contributing to the borough's housing needs. The plan is deeply rooted in sustainable development principles, aiming to create a vibrant new suburb that integrates high-quality housing with ample green spaces and improved infrastructure. This vision ensures that the area is not just a housing development but a well-rounded community with accessible amenities and transportation links. 2) Placemaking and Infrastructure Enhancements: The Council has recognized the existing challenges, such as topographical gradients, and is committed to addressing these through innovative urban design and infrastructure improvements. Development is supported by a comprehensive placemaking strategy that includes enhancements to walking and cycling routes, ensuring they are safe and accessible for residents. Furthermore, the site design will consider the integration of green infrastructure, enhancing the area's connectivity while respecting the natural landscape. 3) Investment in Cycling and Active Travel: Enfield's commitment to promoting active travel is evident through its investment in high-quality cycling infrastructure. The Evidence Base for Enfield Local Plan emphasizes the Council's goal to support the development of cycle routes and active travel networks across the borough. While gradients may pose challenges, the Local Plan acknowledges these and proposes solutions, such as creating alternative routes and investing in earthworks to mitigate steep sections. Moreover, the plan considers other forms of sustainable travel, such as electric bike schemes, to encourage cycling in more challenging areas. 4) Adaptation to LTN 1/20 Compliance: The Council is aware of the cycling infrastructure requirements set out in Local Transport Note 1/20 (LTN 1/20) and has committed to ensuring compliance wherever possible. While some routes may not fully meet the ideal gradient specifications, the Council is exploring alternative solutions, such as phased route improvements and earthworks, to ensure safe and practical cycling options. The Chase Park development also aims to balance immediate compliance with longer-term adaptation strategies to ensure cycling remains a viable option. 5) Holistic Transport Strategy: Chase Park's development is part of a holistic transport strategy that extends beyond cycling. The plan also focuses on improving public transport accessibility, pedestrian routes, and car-sharing schemes, which collectively contribute to achieving the London Plan's ambitious goal of 80% of trips made by foot, cycle, or public transport by 2041. This multi-modal approach ensures that residents have various sustainable travel options, even if cycling presents some challenges in certain areas. Overall, the Council's strategic plan for Chase Park is ambitious and forward-thinking, addressing housing needs while promoting sustainable development. Although Enfield Roadwatch highlights valid concerns about cycling infrastructure, the Council's investment in placemaking, innovative design, and multi-modal transport solutions demonstrate a strong commitment to overcoming these challenges. The plan aligns with the London Plan and national guidance, offering a balanced approach that considers both the immediate and long-term needs of the community. | No | 01687 | Enfield Road Watch |
| **SP PL10: Chase Park** | Enfield RoadWatch, has raised concerns about the Chase Park development under Policy PL10 of the Enfield Local Plan, arguing that it does not conform with the London Plan's sustainable transport targets. The development is seen as promoting car dependency, with unrealistic traffic and transport modelling that fails to align with the goal of 75% of trips being made via walking, cycling, or public transport by 2041. Additionally, the current parking standards are too high and would likely increase car use. Enfield RoadWatch recommends deleting Paragraph 14 of Policy PL10, tightening parking standards, reassessing the transport | Comments noted. Enfield's Chase Park Topic Paper (2024) and other evidence provides a justified response, emphasizing the feasibility and strategic alignment of the Chase Park development. 1) Strategic Vision and Sustainable Growth: The Chase Park development is part of Enfield's broader vision to deliver 3,765 new homes, significantly contributing to the borough's housing needs. The plan is deeply rooted in sustainable development principles, aiming to create a vibrant new suburb that integrates high-quality housing with ample green spaces and improved infrastructure. This vision ensures that the area is not just a housing | No | 01687 | Enfield Road Watch |

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| | modelling for accuracy, and scrutinizing whether “exceptional circumstances” justify developing on Green Belt land. They also wish to participate in the examination hearings to provide further input. | development but a well-rounded community with accessible amenities and transportation links. 2) Placemaking and Infrastructure Enhancements: The Council has recognized the existing challenges, such as topographical gradients, and is committed to addressing these through innovative urban design and infrastructure improvements. Development is supported by a comprehensive placemaking strategy that includes enhancements to walking and cycling routes, ensuring they are safe and accessible for residents. Furthermore, the site design will consider the integration of green infrastructure, enhancing the area's connectivity while respecting the natural landscape. 3) Investment in Cycling and Active Travel: Enfield's commitment to promoting active travel is evident through its investment in high-quality cycling infrastructure. The Evidence Base for Enfield Local Plan emphasizes the Council's goal to support the development of cycle routes and active travel networks across the borough. While gradients may pose challenges, the Local Plan acknowledges these and proposes solutions, such as creating alternative routes and investing in earthworks to mitigate steep sections. Moreover, the plan considers other forms of sustainable travel, such as electric bike schemes, to encourage cycling in more challenging areas. 4) Adaptation to LTN 1/20 Compliance: The Council is aware of the cycling infrastructure requirements set out in Local Transport Note 1/20 (LTN 1/20) and has committed to ensuring compliance wherever possible. While some routes may not fully meet the ideal gradient specifications, the Council is exploring alternative solutions, such as phased route improvements and earthworks, to ensure safe and practical cycling options. The Chase Park development also aims to balance immediate compliance with longer-term adaptation strategies to ensure cycling remains a viable option. 5) Holistic Transport Strategy: Chase Park's development is part of a holistic transport strategy that extends beyond cycling. The plan also focuses on improving public transport accessibility, pedestrian routes, and car-sharing schemes, which collectively contribute to achieving the London Plan’s ambitious goal of 80% of trips made by foot, cycle, or public transport by 2041. This multi-modal approach ensures that residents have various sustainable travel options, even if cycling presents some challenges in certain areas. Overall, the Council's strategic plan for Chase Park is ambitious and forward-thinking, addressing housing needs while promoting sustainable development. Although Enfield Roadwatch highlights valid concerns about cycling infrastructure, the Council's investment in placemaking, innovative design, and multi-modal transport solutions demonstrate a strong commitment to overcoming these challenges. The plan aligns with the London Plan and national guidance, offering a balanced approach that considers both the immediate and long-term needs of the community. | | | |
| **SP PL10: Chase Park** | The NW London RSPB Group objects to the development of Vicarage Farm/Trent Park Equestrian Centre and other Green Belt areas, arguing it would harm significant natural landscapes and adjoining SINCs, violating London Plan Policy G6. They emphasize the site's ecological importance, citing a 2024 survey and decades of ornithological monitoring that highlight its rich biodiversity, including rare and declining bird species. They stress the site's role as a community resource, its health benefits, and the negative impact of urbanization on this protected Green Belt area, advocating for its preservation and removal from the Local Plan. | Comments noted. The Enfield Local Plan aligns with the strategic objectives of preserving and enhancing biodiversity while meeting housing needs. The ELP Spatial Strategy and Overall Approach Topic Paper emphasize a "brownfield first" approach, ensuring every effort is made to use previously developed land before considering Green Belt sites. However, the housing demand necessitates the inclusion of some Green Belt areas, such as Vicarage Farm, which is designed to minimize ecological impacts and integrate green and blue infrastructure enhancements. The Enfield Housing Topic Paper recognises this balanced approach, aiming to protect natural habitats while accommodating growth. Furthermore, comprehensive assessments like the Integrated Impact Assessment (IIA) ensure that ecological and environmental considerations are rigorously addressed. The Site Allocation Topic Paper for Regulation 19 outlines the thorough planning and stakeholder consultation processes, ensuring the proposals are viable, environmentally sensitive, and beneficial for the community. | No | 01700 | NW London RSPB |
| **SP PL10: Chase Park** | The NW London RSPB Group objects to the development of Vicarage Farm/Trent Park Equestrian Centre and other Green Belt areas, arguing it would harm significant natural landscapes and adjoining SINCs, violating London Plan Policy G6. They emphasize the site's ecological importance, citing a 2024 survey and decades of ornithological monitoring that highlight its rich biodiversity, including rare and declining bird species. They stress the site's role as a community | Comments noted. The Enfield Local Plan aligns with the strategic objectives of preserving and enhancing biodiversity while meeting housing needs. The ELP Spatial Strategy and Overall Approach Topic Paper emphasize a "brownfield first" approach, ensuring every effort is made to use previously developed land before considering Green Belt sites. However, the housing demand necessitates the inclusion of some Green Belt areas, such as Vicarage Farm, which is designed to | No | 01700 | NW London RSPB |

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| | resource, its health benefits, and the negative impact of urbanization on this protected Green Belt area, advocating for its preservation and removal from the Local Plan. | minimize ecological impacts and integrate green and blue infrastructure enhancements. The Enfield Housing Topic Paper recognises this balanced approach, aiming to protect natural habitats while accommodating growth. Furthermore, comprehensive assessments like the Integrated Impact Assessment (IIA) ensure that ecological and environmental considerations are rigorously addressed. The Site Allocation Topic Paper for Regulation 19 outlines the thorough planning and stakeholder consultation processes, ensuring the proposals are viable, environmentally sensitive, and beneficial for the community. | | | |
| **SP PL10: Chase Park** | The NW London RSPB Group objects to the proposed development of the open Green Belt countryside along Enfield Road (A110), arguing it will damage significant historic natural landscapes and SINCs, violating London Plan Policy G6. They highlight the area's rich biodiversity, including rare and endangered species, and emphasize its importance for wildlife corridors and nature recovery. They also stress the ecological, recreational, and health benefits of preserving these fields, criticizing the proposed urbanization for undermining the Green Belt's integrity and the rural character of the landscape. | Comments noted. The Enfield Local Plan aligns with the strategic objectives of preserving and enhancing biodiversity while meeting housing needs. The ELP Spatial Strategy and Overall Approach Topic Paper emphasize a "brownfield first" approach, ensuring every effort is made to use previously developed land before considering Green Belt sites. However, the housing demand necessitates the inclusion of some Green Belt areas, such as Vicarage Farm, which is designed to minimize ecological impacts and integrate green and blue infrastructure enhancements. The Enfield Housing Topic Paper recognises this balanced approach, aiming to protect natural habitats while accommodating growth. Furthermore, comprehensive assessments like the Integrated Impact Assessment (IIA) ensure that ecological and environmental considerations are rigorously addressed. The Site Allocation Topic Paper for Regulation 19 outlines the thorough planning and stakeholder consultation processes, ensuring the proposals are viable, environmentally sensitive, and beneficial for the community. | No | 01700 | NW London RSPB |
| **SP PL10: Chase Park** | The NW London RSPB Group strongly objects to Policy PL10 in the Enfield Local Plan, which proposes developing Green Belt land along Enfield Road (EN2). They raise concerns about the loss of ecologically significant countryside, including important wildlife habitats and Sites of Importance for Nature Conservation (SINCs), as well as the potential harm to biodiversity and species like sparrows, starlings, and raptors. The group also highlights the negative impact on public amenities, panoramic views, and the rural character of the area. They recommend removing Policy PL10 to protect the Green Belt, preserve biodiversity, and maintain the landscape's integrity, aligning with The Enfield Society's preferred approach. | The Chase Park Topic Paper 2024 justifies the proposed development under Policy PL10 by emphasising a balanced approach that minimises Green Belt loss and integrates sustainability. The Council's strategy includes achieving Biodiversity Net Gain (BNG) to enhance biodiversity post-development, as well as incorporating green infrastructure and wildlife corridors to mitigate environmental impacts. The development also supports landscape restoration in the north of the borough and improves access to natural spaces like the Lee Valley Regional Park. These measures ensure that housing needs are met while protecting and enhancing the local environment. | No | 01700 | NW London RSPB |
| **SP PL10: Chase Park** | The NW London RSPB Group objects to the development of Vicarage Farm/Trent Park Equestrian Centre and other Green Belt areas, arguing it would harm significant natural landscapes and adjoining SINCs, violating London Plan Policy G6. They emphasize the site's ecological importance, citing a 2024 survey and decades of ornithological monitoring that highlight its rich biodiversity, including rare and declining bird species. They stress the site's role as a community resource, its health benefits, and the negative impact of urbanization on this protected Green Belt area, advocating for its preservation and removal from the Local Plan. | Comments noted. The Enfield Local Plan aligns with the strategic objectives of preserving and enhancing biodiversity while meeting housing needs. The ELP Spatial Strategy and Overall Approach Topic Paper emphasize a "brownfield first" approach, ensuring every effort is made to use previously developed land before considering Green Belt sites. However, the housing demand necessitates the inclusion of some Green Belt areas, such as Vicarage Farm, which is designed to minimize ecological impacts and integrate green and blue infrastructure enhancements. The Enfield Housing Topic Paper recognises this balanced approach, aiming to protect natural habitats while accommodating growth. Furthermore, comprehensive assessments like the Integrated Impact Assessment (IIA) ensure that ecological and environmental considerations are rigorously addressed. The Site Allocation Topic Paper for Regulation 19 outlines the thorough planning and stakeholder consultation processes, ensuring the proposals are viable, environmentally sensitive, and beneficial for the community. | No | 01700 | NW London RSPB |
| **SP PL10: Chase Park** | The NW London RSPB Group objects to the development of Vicarage Farm/Trent Park Equestrian Centre and other Green Belt areas, arguing it would harm significant natural landscapes and adjoining SINCs, violating London Plan Policy G6. They emphasize the site's ecological importance, citing a 2024 survey and decades of ornithological monitoring that highlight its rich biodiversity, including rare and declining bird species. They stress the site's role as a community resource, its health benefits, and the negative impact of urbanization on this protected Green Belt area, advocating for its preservation and removal from the Local Plan. | Comments noted. The Enfield Local Plan aligns with the strategic objectives of preserving and enhancing biodiversity while meeting housing needs. The ELP Spatial Strategy and Overall Approach Topic Paper emphasize a "brownfield first" approach, ensuring every effort is made to use previously developed land before considering Green Belt sites. However, the housing demand necessitates the inclusion of some Green Belt areas, such as Vicarage Farm, which is designed to minimize ecological impacts and integrate green and blue infrastructure enhancements. The Enfield Housing Topic Paper recognises this balanced approach, aiming to protect natural habitats while accommodating growth. Furthermore, comprehensive assessments like the Integrated Impact Assessment | No | 01700 | NW London RSPB |

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| | | (IIA) ensure that ecological and environmental considerations are rigorously addressed. The Site Allocation Topic Paper for Regulation 19 outlines the thorough planning and stakeholder consultation processes, ensuring the proposals are viable, environmentally sensitive, and beneficial for the community. | | | |
| **SP PL10: Chase Park** | The Enfield Over 50s Forum raises concerns about Policy PL10 in the Local Plan, stating it is not legally compliant or sound. They highlight the increasing elderly population in Enfield, emphasizing the need for suitable, accessible housing options. They argue the plan fails to adequately address housing needs for older people, lacks provisions for downsizing, and does not conform to relevant London Plan policies. Additionally, they express concerns about the proposed developments at Chase Park, citing issues with accessibility, car dependency, and potential environmental harm to the Green Belt. They suggest modifications to ensure the plan meets the housing needs of older people and aligns with national policies. | Comments noted. The Council acknowledges the importance of addressing the housing needs of older people. The Chase Park development aims to provide a multi-generational community with a variety of housing options, including those suitable for older residents. PL10 is supported by the Chase Park Topic Paper, which emphasizes accessibility, with a focus on integrating specialist older persons' housing near essential services and public transport. Improvements in public transport and infrastructure, along with accessible green spaces, are part of the strategy to enhance walkability and sustainable living for all residents. The policy also aligns with the London Plan's requirements for accessible housing. The council is committed to engaging with community stakeholders to refine these plans and ensure they meet the diverse needs of Enfield's aging population. Further details and updates will be included in the masterplanning work to ensure compliance and address your concerns comprehensively. | No | 01765 | Enfield Over 50s Forum |
| **SP PL10: Chase Park** | The Enfield Society raises concerns over Policy PL10 for Chase Park, emphasizing the need to protect historic landscapes and the valued Merryhills Way public right of way. The Society highlights the area's significant recreational, scenic, and cultural importance, supported by a 2021 survey showing high usage and appreciation by locals. Proposed developments threaten the integrity of Enfield Chase's historical landscape, contradicting local and London planning policies that mandate the preservation of such environments. These points underscore the need for in-situ conservation over inappropriate biodiversity offsetting. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL10: Chase Park** | The Enfield Society contends that the planned development of 3,700 homes at Chase Park is unsound due to its proposed high density, which is inconsistent with the existing suburban character of the area near Trent Park. This density is more suitable for urban infill sites. Additionally, they argue that achieving 50% affordable housing is unrealistic given the financial assumptions and additional costs identified in the Whole Plan Viability Review. These include significant infrastructure and environmental contributions that are not accounted for, likely reducing the actual percentage of affordable housing that can be delivered. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL10: Chase Park** | The Enfield Society argues that the emphasis on providing new family housing at Chase Park is not justified, given the Council's own evidence forecasting a decline in the number of children and an increase in older residents. They point out discrepancies in the proposed housing mix, with 71% of new homes planned as larger family housing, which exceeds the 60% suggested by the Local Housing Needs Assessment (LHNA). The LHNA indicates a higher need for 2-bedroom properties due to an aging population and declining birth rates, suggesting a shift towards smaller housing is more appropriate. Additionally, the Society notes that the viability testing did not match the proposed housing mix, raising concerns about the feasibility of the current plans. They also emphasize that family housing in London is typically delivered in various forms, not just larger homes, and this should be considered in the planning strategy. Finally, they argue that Gypsy and Traveller accommodation needs could be met without releasing Green Belt land, using other council-owned sites instead. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |

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| **SP PL10: Chase Park** | The Enfield Society's concerns about the urban design and layout of the proposed development at Chase Park are centered on several key points: 1) Respect for Trent Park Setting: The notion that leaving a strip of undeveloped land south of Williams Wood and east of Shaws Wood would respect the setting of Trent Park is flawed. This approach overlooks the historical landscape of the South Walk of Enfield Chase, leading to substantial harm to Trent Park's setting and significance, as required by London Plan Policy HC1. 2) Reflection of Historical Character: The proposal to reflect the rural and historic agricultural character through urban development is fundamentally flawed. The historic character of Enfield Chase is defined by its open landscape, which urban development cannot replicate. 3) Adverse Visual Effects: The ENPlan Landscape Appraisal indicates that the proposed development would have adverse visual impacts, particularly from the north. The high-density core and 4-5 storey buildings would be visible and visually harmful, especially in the early years before the landscape design matures. 4) Incomplete Heritage Understanding: The approach to preserving green space around Trent Park is not based on a thorough understanding of its historical context. The proposals fail to consider how the South Walk historically framed Trent Park, leading to substantial harm to its setting and significance. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL10: Chase Park** | The Enfield Society's concerns about the green and blue infrastructure at Chase Park include the disruption of the SINC's ecological connectivity due to surrounding development, the degradation of its rural setting, and the delayed benefits of extending Trent Country Park. They argue that proposed viewpoints would lose quality, heritage sites would be devalued, and the creation of 'new' open spaces misinterprets existing valued landscapes. Additionally, the proposed Green Belt boundary is seen as indefensible and likely to face development pressures, undermining its purpose. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL10: Chase Park** | The Enfield Society argues that achieving a 75% sustainable transport mode share for Chase Park is unrealistic based on current transport modelling, which shows significant traffic delays, particularly on Hadley Road. They highlight severe traffic impacts and question the feasibility of proposed bus and cycle improvements. The projected delays suggest standstill traffic, making the development unsustainable. Additionally, they raise concerns about the practicality of high-quality bus and cycle routes due to topographical constraints, concluding that the transport targets set by the policy are unachievable. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL10: Chase Park** | The Enfield Society's concerns about Policy PL10: Chase Park focus on the significant harm that development on both sides of Enfield Road would cause to the semi-rural character of the area and the sense of separation between Enfield Town and Oakwood. They highlight ENPlan’s assessment that the high-density, up to 4-5 storey core of the development would have a major adverse visual impact, particularly on high-sensitivity receptors using the London Loop. Additionally, the development would surround the Merryhills Way with housing, compromising its rural character and value as a local open space. The Society also raises concerns about the potential development of the Trent Park Equestrian Centre, which they argue is inappropriate for the Trent Park Conservation Area due to its rural nature. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |

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| **SP PL10: Chase Park** | The Enfield Society's response highlights concerns about the addition of an area in Chase Park at Regulation 19 Stage, primarily due to access issues from Enfield Road. They criticize the handling of a planning application at Arnold House, noting the lack of consideration for Local Plan proposals. They also express significant concerns over ecological damage to the Vicarage Farm and Rifles Site SINC from proposed road construction, non-compliance with NPPF guidelines on habitat protection, and the unlikelihood of achieving sustainable transport targets due to site topography. Furthermore, they question the clarity of the 'placemaking area' concept on the policies map. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL10: Chase Park** | The Enfield Society expresses concerns that the Chase Park development will negatively impact visual aesthetics, causing significant harm to the rural landscape's character, especially from key viewpoints like the London Loop at Cuckolds Hill. They also highlight the potential degradation of biodiversity within the SINC due to the introduction of playing fields and other infrastructure. Questions are raised about the suitability of high-density housing in this sensitive area, the feasibility of promoting active travel given the site's topography, and the practicality of integrating movement frameworks and sustainable transport links effectively. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL10: Chase Park** | The Enfield Society raises concerns about the visual impact of the Chase Park development, stating it would be clearly visible from key viewpoints and harm the area's rural character. They argue that the proposed country park does not compensate for the loss of historic landscapes and would not preserve the scenic quality of Merryhills Way. The Society also highlights that the development would degrade important ecological areas and questions the feasibility of integrating sustainable transport and active travel due to the site's topography and configuration. They suggest that a broader extension of the country park would be more effective. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL10: Chase Park** | The Barnet Society strongly objects to any development that would erode the Green Belt, specifically the green spaces north and south of Hadley Road and Enfield Road. They argue that these areas are vital for maintaining the separate identities of neighboring towns and villages. The Society highlights the importance of these green buffers in preserving the character and identity of the local countryside, which could be lost if the Green Belt is compromised. The Society recommends that the Local Plan should be modified to ensure that the green buffers between the boroughs are preserved, and that no development should take place that would lead to the merging of distinct settlements. They suggest that the plan be revised to avoid any development that threatens the Green Belt, particularly in areas critical for maintaining the separation between different communities. Thir representation recognises the importance of protecting the Green Belt to maintain the distinct identities and countryside character of the areas surrounding Barnet and Enfield. The Barnet Society advocates for stronger protections in the Local Plan to prevent urban sprawl and preserve these important green spaces. | Comments noted. The Enfield Local Plan emphasizes the need for balanced growth while maintaining Green Belt protections. The strategy includes specific policies to prevent urban sprawl and ensure that any Green Belt release is justified by exceptional circumstances and aligned with broader strategic needs. The Integrated Impact Assessment (IIA) thoroughly evaluates the environmental impacts of proposed developments, ensuring that Green Belt releases are minimal and strategically planned to preserve the character and identity of distinct areas. The assessment supports maintaining green buffers where they are crucial to local identities. The Enfield Local Plan’s approach aligns with national policies to protect Green Belt land while addressing housing and infrastructure needs. The Plan carefully considers any necessary Green Belt release, ensuring it is minimal, justified, and designed to maintain the distinct identities of areas like Barnet and Enfield. By reinforcing these protections, the Plan ensures that the unique character of these communities is preserved, countering concerns about suburban sprawl and the merging of distinct settlements. | No | 01817 | The Barnet Society |
| **SP PL10: Chase Park** | Federation of Enfield Residents & Allied Association (FERAA) outlines objections to specific policies (PL10 and PL11) in the Local Plan. For PL10, FERAA consider the plan is not legally compliant or sound because it proposes "ribbon development" along the A110, which is not recognized as a desirable planning | Comments noted. The Enfield Local Plan is both sound and legally compliant, developed based on up-to-date evidence contained in the council’s planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable | No | 03273 | Federation of Enfield Residents & |

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| | form in the National Planning Policy Framework (NPPF).<br>Impact on Trent Country Park: The proposed development would diminish the natural quality of Trent Country Park, compromising its ecological value and the experience of its visitors. FERAA considers the inclusion of this site in the Local Plan appears to be influenced by Comer Homes, a major developer, representing a departure from previous planning policies. FERAA considers the A110 is an inadequate single-lane road that cannot handle the increased traffic from the proposed development, impacting quality of life and student access to schools. The proposed site would be a dormitory settlement with no significant local employment opportunities, leading to severe transport issues. The development would have a low specification, be intrusive, and not address the housing needs of Enfield, potentially leading to a negative impact on quality of life. FERAA recommend the policy should be removed from the Local Plan. | development. The A110 development aligns with the Enfield Local Plan's overall spatial strategy, which aims to accommodate necessary housing growth while maintaining a balance with environmental and infrastructural considerations. The plan acknowledges the potential impacts on Trent Country Park but includes comprehensive mitigation strategies to protect and enhance the park's ecological value and recreational use. This approach is in line with the spatial strategy's emphasis on sustainable growth and protecting green spaces. The plan includes provisions for upgrading the A110 and associated transport links to support increased traffic and mitigate congestion. The intention is to improve road capacity and enhance public transport connections, addressing concerns about the current limitations of the A110. These improvements are designed to integrate with the broader transport strategy, which includes enhancements to local bus services and potential future rail improvements. The inclusion of the site and site allocations in the Local Plan are based on a rigorous evaluation of potential benefits and challenges. The developer, Comer Homes and others, is required to adhere to strict quality standards and community engagement processes, ensuring that the development meets high standards and addresses local needs. The plan aims to deliver a balanced mix of housing types, including family homes, and incorporates community amenities to support a vibrant, sustainable neighbourhood. In summary, the Enfield Local Plan's policies are designed to address the Federation's concerns by incorporating robust mitigation measures, infrastructure enhancements, and community-focused strategies to balance housing needs with environmental protection and quality of life considerations. | | | Allied Associations |
| **SP PL10: Chase Park** | The Federation of Enfield Residents & Allied Associations, raised several significant concerns about the Enfield Local Plan, particularly regarding Policies PL10 and PL11, for Policy PL10: They argue that the development proposal for the A110 is invalid due to its ribbon development approach, which is not supported by the NPPF. This infill between distinct communities would compromise Trent Country Park's ecological value and rural quality. They also express concerns about the influence of Comer, a major developer, which might lead to aggressive development strategies that harm local living conditions. The proposed site is constrained by the A110 road, which cannot handle increased traffic from the new development, affecting quality of life and transport infrastructure. They also criticize the plan for not addressing the high density and inadequate infrastructure, including poor transport links and lack of local employment opportunities, which would exacerbate commuting issues and detract from the area's overall quality of life. In both cases, the Federation asserts that the plans should be revised or deleted to ensure they meet legal and planning soundness requirements. | The Enfield Local Plan is both sound and legally compliant, developed based on up-to-date evidence contained in the council's planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. The A110 development aligns with the Enfield Local Plan's overall spatial strategy, which aims to accommodate necessary housing growth while maintaining a balance with environmental and infrastructural considerations. The plan acknowledges the potential impacts on Trent Country Park but includes comprehensive mitigation strategies to protect and enhance the park's ecological value and recreational use. This approach is in line with the spatial strategy's emphasis on sustainable growth and protecting green spaces. The plan includes provisions for upgrading the A110 and associated transport links to support increased traffic and mitigate congestion. The intention is to improve road capacity and enhance public transport connections, addressing concerns about the current limitations of the A110. These improvements are designed to integrate with the broader transport strategy, which includes enhancements to local bus services and potential future rail improvements. The inclusion of the site and site allocations in the Local Plan are based on a rigorous evaluation of potential benefits and challenges. The developer, Comer Homes and others, is required to adhere to strict quality standards and community engagement processes, ensuring that the development meets high standards and addresses local needs. The plan aims to deliver a balanced mix of housing types, including family homes, and incorporates community amenities to support a vibrant, sustainable neighbourhood. In summary, the Enfield Local Plan's policies are designed to address the Federation's concerns by incorporating robust mitigation measures, infrastructure enhancements, and community-focused strategies to balance housing needs with environmental protection and quality of life considerations. | No | 03273 | Federation of Enfield Residents & Allied Associations |
| **SP PL10: Chase Park** | Friends of Trent Country Park and Trent Park Conservation Committee have expressed significant concerns about the Local Plan's treatment of the Chase Park development, particularly regarding its impact on Sites of Importance for Nature Conservation (SINC). They argue that the development's proposals, including situating school playing fields within the SINC and constructing a road through it, could severely degrade the ecological value of the Royal Enfield Rifles Site and Vicarage Farm. They criticize the lack of comprehensive assessment of increased recreational pressures, potential vegetation clearance, and the overall impact on | The Enfield Local Plan is both sound and legally compliant, developed based on up-to-date evidence contained in the council's planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. The concerns about the Chase Park development's impact on the Sites of Importance for Nature Conservation (SINC) are justified in the Enfield Local Plan and Chase Park Topic Paper, which emphasize balancing development with ecological preservation. The plan includes rigorous environmental assessments and mitigation measures, such | No | 03448 | Friends of Trent Country Park and Trent Park Conservation Committee |

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| | biodiversity. The ecological appraisal by Denis J. Vickers highlights that the development could lead to habitat loss, reduced species richness, and negative effects on wildlife corridors. They also note that the Local Plan's approach to biodiversity net gain is inadequate for addressing the strategic importance of these habitats, which are crucial for maintaining ecological connectivity across the borough. | as creating buffer zones and managing recreational pressures, to protect the SINC and wildlife corridors. The proposed development integrates green infrastructure and heritage park elements, with strategies to maintain ecological value and biodiversity net gain in line with the London Plan and national policies. These measures, supported by extensive placemaking evidence, aim to ensure that development does not compromise the natural environment but instead complements and enhances it. | | | |
| **SP PL10: Chase Park** | Friends of Trent Country Park and Trent Park Conservation Committee have provided a map titled: Walks in and around Trent Country Park and Enfield Chase. | Received with thanks. | No | 03448 | Friends of Trent Country Park and Trent Park Conservation Committee |
| **SP PL10: Chase Park** | Friends of Trent Country Park and Trent Park Conservation Committee have submitted a preliminary ecological appraisal. The preliminary ecological appraisal of Vicarage Farm, commissioned by Friends of Trent Country Park, identifies the site as having significant ecological value, particularly due to its rich bird fauna, despite its poor-average floral diversity. The appraisal suggests that the site meets key criteria for designation as a Site of Borough Importance for Nature Conservation. Concerns are raised about the negative impacts of proposed housing developments on local wildlife habitats, particularly the site's function as a wildlife corridor, due to habitat loss and increased public disturbance. Recommendations include further surveys to confirm biodiversity value and suggestions for habitat restoration to enhance ecological resources. | While the preliminary ecological appraisal highlights concerns about the impact of development on Vicarage Farm's ecological value, the Chase Park Topic Paper 2024 outlines a clear strategy for ensuring that sustainable development and biodiversity preservation can co-exist within the Chase Park Placemaking Area. The Chase Park Topic Paper 2024 outlines a strategy that integrates sustainable development with biodiversity preservation, emphasizing green infrastructure, biodiversity net gain, and the protection of wildlife corridors. It addresses concerns about habitat loss by ensuring that development is accompanied by habitat restoration, including hedgerows and meadows, while enhancing green corridors to maintain ecological connectivity. Additionally, measures to manage public access to sensitive areas help mitigate disturbances to wildlife. The council's approach balances housing needs with ecological conservation, ensuring that development in the Chase Park area is both environmentally responsible and sustainable. | No | 03448 | Friends of Trent Country Park and Trent Park Conservation Committee |
| **SP PL10: Chase Park** | Friends of Trent Country Park and the Trent Park Conservation Committee have raised significant concerns regarding the development proposals under PL10. They argue that the plans could harm the ecological value and conservation integrity of Trent Park and adjacent Sites of Importance for Nature Conservation (SINC). Specifically, they are troubled by the proposed siting of school playing fields and road construction through sensitive areas, which they believe may degrade habitats and increase recreational pressures. Both groups stress that these proposals could undermine conservation efforts, disrupt wildlife, and conflict with established conservation priorities and policies. | The Enfield Local Plan is both sound and legally compliant, developed based on up-to-date evidence contained in the council's planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. The concerns raised by the Friends of Trent Country Park and the Trent Park Conservation Committee regarding PL10 have been carefully addressed through the comprehensive approach detailed in the Chase Park Topic Paper and the placemaking evidence. The Local Plan prioritizes the protection and enhancement of ecological areas, ensuring that any development within Chase Park is designed to mitigate impacts on the surrounding SINCs. The plan includes stringent environmental assessments and design guidelines to minimize habitat disruption and safeguard biodiversity. Moreover, the development proposals incorporate measures to preserve key ecological features, enhance green infrastructure, and improve connectivity between habitats, aligning with best practices in sustainable placemaking and ecological conservation. This balanced approach aims to support necessary development while maintaining the ecological and historical integrity of the area. | No | 03448 | Friends of Trent Country Park and Trent Park Conservation Committee |
| **SP PL10: Chase Park** | The Friends of Trent Country Park and the Trent Park Conservation Committee have significant concerns about Policy PL10, particularly regarding proposed developments at Vicarage Farm and the Trent Park Equestrian Centre. They argue that these developments are not aligned with the London Plan and would adversely impact the historical and ecological integrity of the area. The Friends highlight that Vicarage Farm, which is integral to the rural and historical landscape of Trent Country Park, contributes to its scenic and functional value. The Trent Park Conservation Committee points out that the proposed residential development would encroach on the Conservation Area and diminish its rural character. Additionally, concerns are raised about the impact on the Site of Importance for Nature Conservation (SINC), with doubts about the adequacy of mitigation measures and the potential degradation of important ecological features. | The concerns raised by the Friends of Trent Country Park and the Trent Park Conservation Committee regarding Policy PL10 are acknowledged, but the development proposals for Chase Park are designed with careful consideration of both heritage and environmental factors. The Chase Park Topic Paper 2024 and the placemaking evidence confirm that the development plans include substantial measures to preserve and enhance the local environment, such as maintaining green buffers, improving public access, and incorporating ecological improvements. Specifically, the plans aim to ensure that any development around Vicarage Farm is sensitive to the historical landscape and ecological value, with proposals for public open spaces and enhanced connectivity designed to mitigate potential impacts on the SINC. Moreover, the development strategy includes comprehensive assessments and consultations to address concerns, ensuring that | No | 03448 | Friends of Trent Country Park and Trent Park Conservation Committee |

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| | The overall sentiment is that the proposed developments undermine the historical and environmental significance of the Enfield Chase landscape and Trent Park's unique character. | the historical and ecological significance of Trent Park and Enfield Chase are safeguarded. This balanced approach reflects the commitment to aligning with the London Plan while addressing the specific needs and characteristics of the area. | | | |
| **SP PL10: Chase Park** | The Friends of Trent Country Park and the Trent Park Conservation Committee express deep concerns regarding Policy PL10's potential impact on the setting of Trent Park within Enfield Chase. They argue that the policy's emphasis on development conflicts with its stated aim to respect and enhance Trent Park's significance and setting. Historically, Trent Park, central to Enfield Chase, has maintained visual and contextual connections with its surrounding landscape, which have been increasingly threatened by urban sprawl and development pressures. They highlight the importance of Williams Wood and Shaws Wood, which are part of the Metropolitan Site of Importance for Nature Conservation (SINC), and stress that increasing development near these tranquil areas would violate policies meant to protect such sensitive and tranquil environments. The Committee underscores that the policy framework could exacerbate the strain on these critical natural spaces rather than preserving them. | The concerns raised by the Friends of Trent Country Park and the Trent Park Conservation Committee regarding Policy PL10 are acknowledged, but the development proposals for Chase Park are designed with careful consideration of both heritage and environmental factors. The Chase Park Topic Paper 2024 and the placemaking evidence confirm that the development plans include substantial measures to preserve and enhance the local environment, such as maintaining green buffers, improving public access, and incorporating ecological improvements. Specifically, the plans aim to ensure that any development around Vicarage Farm is sensitive to the historical landscape and ecological value, with proposals for public open spaces and enhanced connectivity designed to mitigate potential impacts on the SINC. Moreover, the development strategy includes comprehensive assessments and consultations to address concerns, ensuring that the historical and ecological significance of Trent Park and Enfield Chase are safeguarded. This balanced approach reflects the commitment to aligning with the London Plan while addressing the specific needs and characteristics of the area. | No | 03448 | Friends of Trent Country Park and Trent Park Conservation Committee |
| **SP PL10: Chase Park** | The Friends of Trent Country Park and the Trent Park Conservation Committee critique Policy PL10 by emphasizing that Vicarage Farm, classified as open space under the London Plan, is crucial for its public benefits despite being privately owned. They argue that the policy's proposed development would significantly diminish the open space value of Vicarage Farm, which provides essential visual and ecological benefits connecting Trent Country Park with its surroundings. They stress that replacing this expansive open land with smaller parks would result in a substantial loss of valuable open space, contrary to the London Plan's protections for such areas. | The Enfield Local Plan is both sound and legally compliant, developed based on up-to-date evidence contained in the council's planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. The Friends of Trent Country Park and the Trent Park Conservation Committee's concerns about Policy PL10 are well-founded in the context of Enfield's placemaking strategy and the broader planning framework. The Chase Park Topic Paper emphasizes the importance of preserving the historic and ecological value of sites like Vicarage Farm, which, despite being privately owned, functions as a significant open space as defined by the London Plan. Development proposals that encroach upon this area would undermine its role in maintaining visual and ecological connectivity with Trent Country Park and surrounding landscapes. The placemaking evidence highlights the necessity of respecting and integrating these open spaces into development plans to ensure they continue to support public enjoyment and ecological integrity. Thus, the policy's proposed development threatens to contravene these principles by compromising the essential open space and failing to align with Enfield's commitment to sustainable and respectful placemaking. | No | 03448 | Friends of Trent Country Park and Trent Park Conservation Committee |
| **SP PL10: Chase Park** | The Friends of Trent Country Park and the Trent Park Conservation Committee express strong reservations about Policy PL10's proposed extension of Trent Country Park into Vicarage Farm. Although they generally support park expansions, they argue that the current proposals would lead to significant losses, including the urbanization of cherished views over Enfield Chase and Merryhills Brook Valley, which are integral to the park's character and public experience. The planned development threatens to degrade the quality of the countryside accessed via Merryhills Way and disrupt the ecological connectivity between Trent Park and Vicarage Farm SINC, as noted by ecologist Denis J. Vickers. Additionally, the proposed road connection contradicts the intention to extend the park, further undermining the benefits of the extension and its alignment with the park's conservation goals. | The Enfield Local Plan is both sound and legally compliant, developed based on up-to-date evidence contained in the council's planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. The Friends of Trent Country Park and the Trent Park Conservation Committee's concerns about Policy PL10 are well-founded in the context of Enfield's placemaking strategy and the broader planning framework. The Chase Park Topic Paper emphasizes the importance of preserving the historic and ecological value of sites like Vicarage Farm, which, despite being privately owned, functions as a significant open space as defined by the London Plan. Development proposals that encroach upon this area would undermine its role in maintaining visual and ecological connectivity with Trent Country Park and surrounding landscapes. The placemaking evidence highlights the necessity of respecting and integrating these open spaces into development plans to ensure they continue to support public enjoyment and ecological integrity. Thus, the policy's proposed development threatens to contravene these principles by compromising the essential open space and failing to align with Enfield's commitment to sustainable and respectful placemaking. | No | 03448 | Friends of Trent Country Park and Trent Park Conservation Committee |
| **SP PL10: Chase Park** | The Friends of Trent Country Park and the Trent Park Conservation Committee criticize the PL10 proposals for new open spaces, arguing that these would fail to offset the loss of the open countryside in the Merryhills Brook Valley. They assert that even though a buffer zone along Trent Park's edge is an improvement over | The Enfield Local Plan is both sound and legally compliant, developed based on up-to-date evidence contained in the council's planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. The Friends of Trent | No | 03448 | Friends of Trent Country Park and Trent Park |

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| | direct development, it would still erode the valued rural setting enjoyed by park users and local residents. They emphasize that, despite Vicarage Farm being private land, its open views are considered public space under the London Plan's definition of Open Space, thus reinforcing the significance of preserving this visual and experiential quality. | Country Park and Trent Park Conservation Committee's concerns regarding PL10 are justified based on the Enfield Chase Park Topic Paper and placemaking evidence. The Topic Paper highlights that Vicarage Farm and the Merryhills Brook Valley are integral to the setting of Trent Park, providing essential open views and contributing to its rural character, which are crucial for the park's historical and environmental significance. The placemaking evidence emphasizes the need to maintain such vistas and the quality of open spaces to ensure that development does not undermine the area's character and ecological connectivity. The proposed buffer zones and new open spaces may not fully compensate for the loss of these high-quality landscapes and their associated public benefits. The development could disrupt the visual and experiential value of the landscape, as it is integral to the park's character and accessibility, as outlined in the placemaking evidence and Topic Paper. | | | Conservation Committee |
| **SP PL10: Chase Park** | The Friends of Trent Country Park and Trent Park Conservation Committee critique Policy PL10 by highlighting that the proposed development would significantly degrade the current green links between Trent Park and Enfield Chase, such as the Merryhills Way and paths from Lakeside. These routes, currently offering rural, scenic views, would become urbanized, resulting in a substantial loss of countryside character and connectivity. They argue that Vicarage Farm serves as a vital countryside gateway to Trent Park, and its transformation into developed land would undermine this role. This development would contradict Policy PL9, which emphasizes the need for new development to integrate sensitively with Enfield Chase and preserve key visual and physical connections, leading to a loss of important entrance points, rural vistas, and strategic views. | The Friends of Trent Country Park and Trent Park Conservation Committee's concerns about Policy PL10 are justified as the proposed development undermines the preservation of critical green links and scenic vistas integral to Trent Park and its surrounding landscape. According to the Chase Park Topic Paper (2024), the area designated for development, including Vicarage Farm, contributes significantly to the rural character and visual connectivity of Trent Park, aligning with Enfield's placemaking goals that emphasize maintaining open countryside and strategic views. The development risks urbanizing key routes such as the Merryhills Way and paths from Lakeside, which are essential for preserving the park's rural ambiance and visual links to Enfield Chase. The Enfield placemaking evidence underscores the importance of integrating new developments sensitively with existing landscapes to prevent the loss of these valued characteristics. Thus, the proposed changes would likely result in a considerable net loss of rural quality and strategic views, contrary to the objectives outlined in local planning and placemaking policies. | No | 03448 | Friends of Trent Country Park and Trent Park Conservation Committee |
| **SP PL10: Chase Park** | The Bush Hill Park Residents' Association strongly opposes the removal of Green Belt for Chase Park as proposed in Policy PL10, arguing that it contradicts the current Development Plan, which designates this area as the Enfield Chase Area of Special Character. They emphasize the historical significance of the landscape and echo concerns from Historic England regarding the inadequate assessment of potential impacts on designated heritage assets. Furthermore, they argue that developing Vicarage Farm would erode the rural buffer between Enfield and Oakwood, leading to an undesirable urban sprawl. As a result, they advocate for the deletion of this policy. | Comments noted. The Chase Park Topic Paper 2024, acknowledges concerns about the potential loss of countryside and semi-rural character designated as Green Belt and an Enfield Chase Area of Special Character. Policy PL10 is part of a balanced development strategy aimed at meeting housing needs while preserving environmental quality and community identity. They measures outlined in the paper, such as stringent design guidelines and green space provisions, to mitigate impacts on local character and ensure sustainable development practices. Furthermore, the council recognises ongoing efforts to enhance infrastructure and public services in tandem with new developments, aiming to alleviate concerns about overpopulation and infrastructure strain. This approach aims to reassure residents that development under Policy PL10 will be carried out responsibly, respecting the unique qualities of Crews Hill while meeting Enfield's housing demands. | No | 04218 | Bush Hill Park Residents Association |
| **SP PL10: Chase Park** | borough. However, the justification for developing on protected Green Belt land is insufficient. In 2019, the Enfield Society and CPRE identified brownfield sites for over 37,000 homes, surpassing the Local Plan's requirement of at least 33,280 homes and the London Plan targets. The proposed development at PL10 (Chase Park) would harm the Enfield Chase Area of Special Character and Trent Park Conservation Area, contradicting efforts to enhance the Borough's green spaces. | The Enfield Local Plan is both sound and legally compliant, emphasizing a brownfield-first approach to ensure sustainable development. Green Belt sites are only considered under exceptional circumstances, thoroughly justified in the Exceptional Circumstances Topic Paper. The plan evaluates all reasonable options to meet housing and employment needs, supported by comprehensive evidence such as the Spatial Strategy and Overall Approach Topic Paper. The Integrated Impact Assessment (IIA) ensures alignment with national policies and community needs. | No | 06825 | Fox Lane District Residents' Association |
| **SP PL10: Chase Park** | The Green Party has strong reservations about Enfield's Local Plan to remove sites from the Green Belt, including Chase Park and Crews Hill Station. They argue that building on Green Belt land is harmful in planning terms and detrimental to climate crisis mitigation. They emphasize the need to prioritize brownfield sites and underutilized land before considering Green Belt development. Additionally, they criticize the Local Plan's summary leaflet for being misleading about the | Comments noted. The "Enfield Local Plan Spatial Strategy and Overall Approach" document sets out the council's justifications of limited Green Belt development by highlighting the critical housing needs within the borough. It emphasizes that the strategy prioritizes brownfield sites and underutilized land, but due to the scale of housing demand, some Green Belt sites were considered for sustainable development. The document outlines that these developments are carefully | No | 01147 | The Green Party |

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| | extent of Green Belt development, which prevents residents from making informed decisions. | planned to minimize environmental impact and are essential to meet Enfield's long-term growth needs. | | | |
| **SP PL10: Chase Park** | Residents strongly oppose the PL10 development, citing concerns over irreversible damage to the green belt land's character, identity, and historical significance. They argue that the Enfield Chase Area of Special Character, which is crucial to the area's unique value and purpose of the green belt designation, would be fundamentally altered by construction. The development threatens to permanently erase a vital part of Enfield Chase's historic landscape, undermining the community's heritage. Additionally, the urbanization of Merryhills Way, a valued Public Right of Way, would deprive residents of access to nature and respite from urban stress. The impact on the Trent Park Conservation Area and the potential for increased traffic, air pollution, and greenhouse gas emissions due to the car-dominated nature of the development are also major concerns, challenging efforts to promote sustainability and combat climate change. | Comments noted. Policy PL10 is sound and emphasizes a balanced approach to development while preserving the area's semi-rural character and green spaces. The ELP Spatial Strategy and Overall Approach Topic Paper prioritizes sustainable development, aiming to utilize brownfield sites before considering Green Belt land. The Exceptional Circumstances Topic Paper outlines the stringent criteria for justifying any necessary Green Belt development, ensuring strong environmental protections and community benefits. The Chase Park Topic Paper includes measures to mitigate environmental impacts and maintain public access to green spaces. | No | 01762 | Cllr O'Halloran |
| **SP PL10: Chase Park** | Councillor Emma Supple objects to PL10. She emphasized Enfield's reputation for its Green Belt, offering a mix of access to central London and rural open spaces. She criticized the Local Plan for not minimizing harm to the Green Belt, as it aims to permanently remove parts of it, building on ancient farms and natural landscapes. She highlighted that nearly 7,000 public responses overwhelmingly opposed the plan, particularly regarding Green Belt development and high-rise buildings. Residents voiced their concerns through council meetings and petitions, advocating for the preservation of natural countryside, farmland, and woodlands to support local farming, wildlife, and quality of life. Councillor Supple pointed out the importance of Crews Hill's rural industry, which includes garden centres and commercial enterprises, contributing significantly to the local economy. She noted widespread protests from groups like the Friends of local parks, the Enfield Society, and other resident organizations against the Green Belt destruction, concluding that the proposal is unsound. | Comments noted. The Local Plan seeks to significantly increase the number of new homes to meet a wide range of needs including affordable homes, accessible homes and homes for older people. It also seeks to regenerate and renew the Borough and is considered the be an appropriate strategy. | No | 02003 | Cllr Supple |
| **SP PL11: Crews Hill** | The GLA has significant concerns about the ability of Crews Hill and Chase Park to deliver sustainable neighbourhoods that are not car-dependent. | Comments noted. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP PL11: Crews Hill** | The GLA emphasises the need for a robust, masterplanned, and phased implementation strategy to ensure upfront provision of infrastructure and public transport services. Additionally, a realistic funding strategy is crucial to support this delivery and optimise land use. | Comments noted. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP PL11: Crews Hill** | The GLA expresses concerns that the high cost of providing transport infrastructure and services for new, isolated settlements may not be realistic or viable. This could result in car-dependent areas with poor access to essential services and increased pressure on the road network. | Comments noted. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP PL11: Crews Hill** | Broxbourne Borough Council questions the accuracy of Enfield's traffic modelling, particularly for the 5,500 new dwellings at Crews Hill and the proposed employment allocation west of Rammey Marsh. Broxbourne's previous transport modelling, conducted with Hertfordshire County Council, indicated that several junctions would be operating at or near capacity by 2033. However, Enfield's modelling shows lower congestion levels for the same junctions. Broxbourne fears that Enfield's underestimated traffic impacts could jeopardize planned interventions on the A10 and result in severe highway network impacts, rendering the Local Plan unsound. | Comments noted. The Council maintains that the Local Plan is sound and based on an up-to-date evidence base, particularly the comprehensive transport modelling detailed in the Movement and Connectivity evidence base. This modelling, conducted independently by WSP, aligns with national guidelines and incorporates future growth projections, including developments at Crews Hill and Rammey Marsh. The discrepancy noted by Broxbourne Council arises from the use of different modelling approaches and assumptions. The Council remains committed to working with neighboring councils to address cross-boundary transport impacts and ensure sustainable development. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the Broxbourne Council to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00580 | Broxbourne Borough Council |
| **SP PL11: Crews Hill** | HCC's response on the comprehensive development of the Crews Hill placemaking area notes potential impacts on Hertfordshire due to its proximity to | Comments noted. The Enfield Local Plan acknowledges HCC's comments regarding potential impacts on neighboring areas, specifically Broxbourne and | No | 01602 | Hertfordshire County |

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| | the Borough of Broxbourne to the north and Welwyn Hatfield Borough to the northwest. The Minerals Planning Authority has no concerns about mineral sterilisation, despite the presence of superficial sand and gravel deposits at the county boundary in Welwyn Hatfield. There are no safeguarded mineral sites near Crews Hill. | Welwyn Hatfield Boroughs, due to the proposed Chase Park urban extension. The Council appreciates the confirmation from the Minerals Planning Authority and the Waste Planning Authority that there are no concerns related to mineral sterilisation or safeguarded waste management facilities near Chase Park. The Council remains committed to ongoing collaboration with Hertfordshire authorities to mitigate any cross-boundary impacts and ensure sustainable development that benefits all involved communities. | | | Council - Minerals and Waste planning authority |
| **SP PL11: Crews Hill** | HCC highlights the nearby Waste Management Site, Cattlegate Farm, less than 250m to the northwest, which is safeguarded under Policy 5 of the adopted Waste Core Strategy. This policy opposes developments that could prevent or prejudice waste management uses unless equivalent alternative provision is made or the need for the facilities is no longer justified. The Waste Planning Authority does not consider the Crews Hill development to pose a safeguarding concern but advises the borough council to ensure the waste facility will not impact the placemaking area. Additionally, the 'Agent of Change' principle should be applied to ensure the integration of new developments with existing businesses. | Comments noted. The Enfield Local Plan acknowledges HCC's comments regarding potential impacts on neighboring areas, specifically Broxbourne and Welwyn Hatfield Boroughs, due to the proposed Chase Park urban extension. The Council appreciates the confirmation from the Minerals Planning Authority and the Waste Planning Authority that there are no concerns related to mineral sterilisation or safeguarded waste management facilities near Chase Park. The Council remains committed to ongoing collaboration with Hertfordshire authorities to mitigate any cross-boundary impacts and ensure sustainable development that benefits all involved communities. | No | 01602 | Hertfordshire County Council - Minerals and Waste planning authority |
| **SP PL11: Crews Hill** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |
| **SP PL11: Crews Hill** | HCC's response acknowledges the positive sustainable travel principles for the Crews Hill site allocation and the goal of a 75% sustainable modal share. However, they raise concerns about increased vehicular trips into Hertfordshire, particularly on unsuitable routes like Wagon Road, Dancers Hill Road, and Baker Street. They suggest strategic mitigation measures at J24 of the M25 and highlight the need for further investigation and mitigation along Cattlegate Road and its junctions. HCC expresses willingness to engage in discussions to address these issues. | Comments noted. HCC's concerns about increased vehicular traffic into Hertfordshire and the potential impacts on routes like Wagon Road, Dancers Hill Road, and Baker Street are understood. Enfield has conducted extensive transport modelling work to address these issues, as detailed in our evidence base. The need for strategic mitigation measures at J24 of the M25 are recognised and are committed to exploring solutions with HCC. The Council is keen to engage further on this matter and will prepare a Statement of Common Ground (SoCG) with HCC to collaboratively address these transportation concerns and ensure the proposed developments align with both Enfield's and Hertfordshire's strategic transport and infrastructure goals. | No | 01755 | Hertfordshire County Council - Highways |
| **SP PL11: Crews Hill** | HCC notes the potential implications of the planned urban extensions at Crews Hill and Chase Farm but has no further comments at this time. They emphasise the need for effective cross-boundary collaboration for the Local Nature Recovery Strategy (LNRS) to ensure connectivity of green corridors and woodland creation. | Comments noted. | No | 01755 | Hertfordshire County Council - Sustainability |
| **SP PL11: Crews Hill** | HCC's response indicates that both Education and Early Years are reassured by the provisions at the proposed sites at Chase Park and Crews Hill. However, HCC expects Enfield to meet its own needs and clarifies that Hertfordshire will not expand its provision to accommodate demand from outside its area. | Comments noted. | Yes | 01755 | Hertfordshire County Council - Education and Early Years |
| **SP PL11: Crews Hill** | The NHS London Healthy Urban Development Unit (HUDU) acknowledges the challenge Enfield Council faces in meeting its housing need of 1,246 homes per year. HUDU notes that significant growth is planned for urban extension sites at Chase Park and Crews Hill, with full delivery extending beyond the plan period (2024-2041). These developments are expected to include new local centres with health facilities, but predicting future healthcare needs is challenging given the 20-year timescale. HUDU urges the Council to accommodate changing health priorities and demands over the plan period, considering potential shifts in national priorities or circumstances (e.g., pandemics, new treatments). They recommend | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |

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| | ongoing consultation with the Integrated Care Board (ICB) and NHS Trusts, and full engagement with the ICB during master-planning and pre-application processes for major developments to ensure evolving healthcare needs are met. | | | | |
| **SP PL11: Crews Hill** | The NHS London Healthy Urban Development Unit generally supports the allocation of Crews Hill. They urge the Council to accommodate changing health needs and priorities over the site's long delivery timescale. | Comments noted. The Local Plan takes into account all of the infrastructure needs that will be required throughout the Plan period and the Infrastructure Delivery Plan will be continously updated. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP PL11: Crews Hill** | While acknowledging an emerging IDP, TfL cannot support the inclusion of Crews Hill and Chase Park without a realistic Infrastructure Delivery Plan, car parking restraint commitment, and conditions for a coordinated masterplanned approach optimizing density. TfL queries the soundness of the Spatial Strategy under these conditions. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL11: Crews Hill** | TfL comments that the current wording, though revised, still lacks clarity. It should specifically mention London Overground services and clarify that no station capacity improvements are planned for Piccadilly line stations. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL11: Crews Hill** | TfL officers considers that there is a lack of detail on transport proposals, and the feasibility and costs of providing necessary public transport have been underestimated by Enfield’s consultants. A costed and agreed Infrastructure Delivery Plan is absent, which is particularly worrying. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL11: Crews Hill** | TfL officers considers that there is a need to limit car parking to ensure sustainable travel patterns and support public transport viability. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL11: Crews Hill** | TfL officers considers that even with proposed bus services, the Public Transport Accessibility Level (PTAL) at Crews Hill would remain low (1b to a maximum of 3), unlike the higher PTAL areas in the urban parts of the borough. This diminishes the potential for high public transport use and undermines policy part 18e's goal of having all residents within 400 meters of a bus stop. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL11: Crews Hill** | TfL officers considers there is insufficient detail on the developments' nature, trip generation, and mode share. High car ownership assumptions (1.15 cars per dwelling) contrast sharply with urban areas (0-0.2 cars per dwelling), indicating potential car dependency. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL11: Crews Hill** | TfL officers highligjhts the transport modeling predicts significant increases in peak-time traffic on local roads, indicating high delays at network access points. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL11: Crews Hill** | TfL considers the absence of a masterplanned approach and the identification of six separate site allocations raise concerns about achieving a comprehensive, integrated development. This could lead to car-dominated development, contrary to the Good Growth objectives of the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| **SP PL11: Crews Hill** | TfL considers the high costs of necessary transport infrastructure for these isolated settlements may jeopardize other priorities like affordable housing and social infrastructure. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL11: Crews Hill** | TfL concludes that the current proposals for Crews Hill are likely to result in car-dependent development from the outset, which contradicts the objectives of sustainable growth and Good Growth as outlined in the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP PL11: Crews Hill** | TfL does not consider the sites at Chase Park (PL10) SA10.1 – SA10.4, Crews Hill (PL11) SA11.1 – SA11.6, land opposite Enfield Crematorium (RUR.01), and land between Camlet Way and Crescent West, Hadley (RUR.02) suitable for housing. This is due to their poor transport connectivity and the high costs required to provide sustainable transport access comparable to urban sites in the borough. Developing these sites is likely to lead to car-dependent development, which is contrary to the Good Growth objectives of the London Plan and the NPPF. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
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| **SP PL11: Crews Hill** | Welwyn Hatfield Borough Council supports the master-planned approach for the Crews Hill development (PL11) but has concerns about its proximity to Cuffley. The current 3.5km gap between the settlements could reduce to 1.5km, potentially harming the Green Belt.<br><br>The proposed development extends up to the M25 and the Welwyn Hatfield boundary, which could significantly narrow the gap with Cuffley. The Council cites the Greater London Authority's comments on the need for exceptional | Further engagement and statement of common ground to consider willingness to engage with Enfield Council under Duty to Cooperate arrangements for both Local Plans. | No | 01920 | Welwyn Hatfield Borough Council |

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| | circumstances to alter Green Belt boundaries and notes Enfield's assessment indicating "Very High Harm" from this development.<br><br>Welwyn Hatfield's own Green Belt Study identifies the land south of Cuffley as contributing to preventing town merging and safeguarding the countryside. The M25 serves as a clear boundary separating Enfield from Welwyn Hatfield.<br><br>The Infrastructure Delivery Plan (IDP) outlines necessary infrastructure for Enfield's growth, requiring engagement with neighboring authorities to mitigate impacts on services, traffic, and transport.<br><br>Northaw and Cuffley Parish Council will raise concerns about the local highway network and railway capacity. Welwyn Hatfield seeks assurances that the Local Plan has thoroughly considered these impacts and identified funding for necessary mitigation measures.<br><br>Welwyn Hatfield requests to be kept informed about the plan's progress and expresses willingness to engage constructively with Enfield Council under the duty to cooperate framework. | | | | |
| **SP PL11: Crews Hill** | The Environment Agency recommends expanding the 'Green Infrastructure' policy in PL11 – Crews Hill to 'Green and Blue Infrastructure' to better reflect the significance of watercourses within the area. Additionally, the EA strongly suggests incorporating a standalone policy point on flood risk, given the flood risk issues in Edmonton Green, and adding a specific policy point for groundwater and land quality to address historic contamination. The EA supports the inclusion of wording on the naturalisation and ecological enhancement of waterways and recommends applying this to all place policies with rivers, including PL11. Furthermore, they suggest making a clear distinction between fluvial and surface water flood risks. | The Council welcomes the detailed feedback on Policy PL11 – Crews Hill. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |
| **SP PL11: Crews Hill** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL11: Crews Hill and its site allocations including: SA11.1: Land at Crews Hill, SA11.2: Land South of Cattlegate Road, Crews Hill, SA11.3: Land South of M25, Crews Hill, SA11.4: Land North and South of Cattlegate Road, SA11.5: Land East of Theobalds Road Park, Crews Hill and SA11.6:Land South West of Theobalds Park Road - this includes Turkey Brook and Cuffley Brook. | The Council acknowledges the importance of referencing nearby water bodies and will ensure they are included in the relevant site allocations. For Policy PL11: Crews Hill, including sites SA11.1 (Land at Crews Hill), SA11.2 (Land South of Cattlegate Road), SA11.3 (Land South of M25), SA11.4 (Land North and South of Cattlegate Road), SA11.5 (Land East of Theobalds Park Road), and SA11.6 (Land South West of Theobalds Park Road), this includes Turkey Brook and Cuffley Brook. We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | Yes | 01926 | Environment Agency |
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| | SA11.6:Land South West of Theobalds Park Road - this includes Turkey Brook and Cuffley Brook. | encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | | | |
| **SP PL11: Crews Hill** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL11: Crews Hill and its site allocations including: SA11.1: Land at Crews Hill, SA11.2: Land South of Cattlegate Road, Crews Hill, SA11.3: Land South of M25, Crews Hill, SA11.4: Land North and South of Cattlegate Road, SA11.5: Land East of Theobalds Road Park, Crews Hill and SA11.6:Land South West of Theobalds Park Road - this includes Turkey Brook and Cuffley Brook. | The Council acknowledges the importance of referencing nearby water bodies and will ensure they are included in the relevant site allocations. For Policy PL11: Crews Hill, including sites SA11.1 (Land at Crews Hill), SA11.2 (Land South of Cattlegate Road), SA11.3 (Land South of M25), SA11.4 (Land North and South of Cattlegate Road), SA11.5 (Land East of Theobalds Park Road), and SA11.6 (Land South West of Theobalds Park Road), this includes Turkey Brook and Cuffley Brook. We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | Yes | 01926 | Environment Agency |
| **SP PL11: Crews Hill** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL11: Crews Hill and its site allocations including: SA11.1: Land at Crews Hill, SA11.2: Land South of Cattlegate Road, Crews Hill, SA11.3: Land South of M25, Crews Hill, SA11.4: Land North and South of Cattlegate Road, SA11.5: Land East of Theobalds Road Park, Crews Hill and SA11.6:Land South West of Theobalds Park Road - this includes Turkey Brook and Cuffley Brook. | The Council acknowledges the importance of referencing nearby water bodies and will ensure they are included in the relevant site allocations. For Policy PL11: Crews Hill, including sites SA11.1 (Land at Crews Hill), SA11.2 (Land South of Cattlegate Road), SA11.3 (Land South of M25), SA11.4 (Land North and South of Cattlegate Road), SA11.5 (Land East of Theobalds Park Road), and SA11.6 (Land South West of Theobalds Park Road), this includes Turkey Brook and Cuffley Brook. We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | Yes | 01926 | Environment Agency |
| **SP PL11: Crews Hill** | The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation. They strongly recommend that place policies with rivers (PL3, PL4, PL5, PL7, PL8, PL9, PL10, and PL11) include wording that encourages or requires river restoration and naturalisation. For Policy PL11: Crews Hill and its site allocations including: SA11.1: Land at Crews Hill, SA11.2: Land South of Cattlegate Road, Crews Hill, SA11.3: Land South of M25, Crews Hill, SA11.4: Land North and South of Cattlegate Road, SA11.5: Land East of Theobalds Road Park, Crews Hill and SA11.6:Land South West of Theobalds Park Road - this includes Turkey Brook and Cuffley Brook. | The Council acknowledges the importance of referencing nearby water bodies and will ensure they are included in the relevant site allocations. For Policy PL11: Crews Hill, including sites SA11.1 (Land at Crews Hill), SA11.2 (Land South of Cattlegate Road), SA11.3 (Land South of M25), SA11.4 (Land North and South of Cattlegate Road), SA11.5 (Land East of Theobalds Park Road), and SA11.6 (Land South West of Theobalds Park Road), this includes Turkey Brook and Cuffley Brook. We will also review the place policies to incorporate wording that encourages or requires river restoration and naturalisation, as recommended by the Environment Agency. | Yes | 01926 | Environment Agency |
| **SP PL11: Crews Hill** | Crews Hill Golf Club (CHGC) objects to the Local Plan's allocation of land for housing development within the CHGC area, which is a 109-acre site designated as a Site of Importance for Nature Conservation (SINC), protected Green Belt, and Local Open Space. CHGC emphasizes that their land contains rare lowland dry acid grassland and deciduous woodland, including ancient oak trees, which are critical to preserve. Despite a reduction in the proposed housing numbers from over 3,000 to 200 homes, CHGC argues that any development on this land would undermine its ecological value, SINC status, and conflict with Enfield's Biodiversity Action Plan. CHGC calls for no development on the golf course, no release of Green Belt land, and an upgrade of its SINC status to Metropolitan, as supported by their commissioned ecological report. | Comments noted. The Crews Hill Topic Paper emphasizes the strategic significance of Crews Hill for development, it also outlines a commitment to protect biodiversity and open spaces, which includes recognizing the importance of local heritage assets and Sites of Importance for Nature Conservation (SINC). The Council has considered the site's SINC status, as well as the designation of certain areas for conservation. However, the Topic Paper makes clear that some parts of Crews Hill are seen as viable for development to meet the borough's housing needs. The Council has taken steps to reduce the housing targets in Crews Hill, including on the golf course site, while ensuring that important natural features, such as the rare lowland dry acid grassland, are preserved. Moreover, the Topic Paper recognises the necessity of consultation and evidence-based decision-making, which includes the ongoing evaluation of SINCs and other ecological assets as part of the planning process. The Council acknowledges that Crews Hill Golf Club is a significant ecological and recreational space but maintains that limited and carefully planned development can coexist with conservation efforts. While Crews Hill Golf Club's concerns about the potential impact on heritage and ecology are valid, the Crews Hill Topic Paper outlines a framework that seeks to mitigate these risks by balancing necessary development with environmental protection. The Council will continue to work with stakeholders, including the golf club, to ensure that the planning process reflects both the preservation of important ecological assets and the delivery of essential housing. | No | 01738 | Crews Hill Golf Club |
| **SP PL11: Crews Hill** | Crews Hill Golf Club argues that the Local Plan is not compliant with relevant legislation, does not meet the soundness tests outlined in the National Planning Policy Framework (NPPF), and fails to comply with the duty to cooperate. They | Comments noted. The Crews Hill Topic Paper emphasizes the strategic significance of Crews Hill for development, it also outlines a commitment to protect biodiversity and open spaces, which includes recognizing the importance of local | No | 01738 | Crews Hill Golf Club |

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| | contend that the plan overlooks the heritage significance of Crews Hill Golf Course, which was designed in 1916 by renowned golf architect Harry Colt, making it a Local Heritage Asset. While the Local Plan acknowledges 'The Red House' as a Local Heritage Asset, CHGC asserts that their course should be similarly recognized and preserved due to its historical value, design significance, and contribution to local heritage, as demonstrated by Colt's celebrated legacy in golf course architecture. | heritage assets and Sites of Importance for Nature Conservation (SINC). The Council has considered the site's SINC status, as well as the designation of certain areas for conservation. However, the Topic Paper makes clear that some parts of Crews Hill are seen as viable for development to meet the borough's housing needs. The Council has taken steps to reduce the housing targets in Crews Hill, including on the golf course site, while ensuring that important natural features, such as the rare lowland dry acid grassland, are preserved. Moreover, the Topic Paper recognises the necessity of consultation and evidence-based decision-making, which includes the ongoing evaluation of SINCs and other ecological assets as part of the planning process. The Council acknowledges that Crews Hill Golf Club is a significant ecological and recreational space but maintains that limited and carefully planned development can coexist with conservation efforts. While Crews Hill Golf Club's concerns about the potential impact on heritage and ecology are valid, the Crews Hill Topic Paper outlines a framework that seeks to mitigate these risks by balancing necessary development with environmental protection. The Council will continue to work with stakeholders, including the golf club, to ensure that the planning process reflects both the preservation of important ecological assets and the delivery of essential housing. | | | |
| **SP PL11: Crews Hill** | Thompsons of Crews Hill Ltd's concerns regarding Policy PL11 reflect broader issues already raised with Policy SS1, emphasizing a lack of clear and justified reasoning for Green Belt release at Crews Hill. The company argues that: 1) Ambiguity in Policy Requirements: The policy lacks clarity, particularly with its requirement for a 'detailed comprehensive masterplan' before planning permissions are granted. The referenced figure 3.14 is considered too vague and general, lacking specificity about development areas and local centre frontages impacting Thompsons' land. 2) Contradictory and Imprecise Criteria: Criteria 9's provision for the potential relocation of existing rural uses, including horticultural businesses, is seen as contradictory and imprecise. The policy emphasizes the importance of retaining these uses while also allowing for their relocation if sites become unsuitable, without defining which uses or the criteria for their suitability. 3) Uncertain Use of Compulsory Purchase Powers: The mention of compulsory purchase powers in paragraph 3.172 introduces further uncertainty. Thompsons criticizes the lack of meaningful engagement with affected businesses and residents prior to the draft Local Plan, leading to a decision that appears pre-determined and unresponsive to local feedback. Overall, Thompsons argues that the policy is flawed due to inadequate consultation and insufficient detail, suggesting that the entire site allocation and evidence base should be reviewed. They call for a revised policy and additional consultation before any decision on the Crews Hill allocation is finalized. | The Enfield Local Plan is a robust and legally compliant framework, meticulously developed to address housing needs while adhering to national policies and safeguarding local character. The plan's approach to Green Belt release, including at Crews Hill, is both justified and necessary, as detailed in the council's comprehensive evidence base. The Local Plan is grounded in up-to-date and extensive research, including the Exceptional Circumstances Topic Paper. This document clearly demonstrates that the release of Green Belt land at Crews Hill is driven by exceptional circumstances, such as the pressing need to meet the borough's substantial housing targets. The evaluation of Green Belt sites has been thorough, with detailed assessments confirming that alternative brownfield sites have been exhaustively explored and deemed insufficient to meet the required housing demand. The Spatial Strategy and Overall Approach Topic Paper outlines the strategic necessity of Green Belt release to accommodate Enfield's growth. The selection process for these sites includes rigorous analysis to ensure that the release is justified, proportionate, and in line with national policy requirements. The plan balances the need for new housing with the preservation of local character and amenities, demonstrating a careful and deliberate approach to urban planning. The Housing Topic Paper and the Local Housing Needs Assessment provide a detailed analysis of housing requirements, reflecting realistic capacity assessments. The housing targets are aligned with anticipated needs, ensuring that growth is sustainable and supportive of community development. The plan includes provisions for family housing and considers the benefits of urban regeneration, as mandated by Policy D3 of the London Plan. This comprehensive approach ensures that development aligns with both local and regional planning objectives. The Exceptional Circumstances Topic Paper articulates the rationale behind Green Belt release, highlighting the necessity of such measures to address the urgent housing need while maintaining compliance with the National Planning Policy Framework (NPPF). This paper, along with other planning documentation, provides clear evidence that the decision to release Green Belt land is not taken lightly but is essential to achieving a balanced and sustainable growth strategy. The Local Plan has undergone extensive consultation, ensuring that community feedback and local needs have been incorporated into the final policy. The process has been transparent and inclusive, allowing for meaningful input from stakeholders, including existing businesses and residents. In summary, the Enfield Local Plan is a well-founded and legally sound document that effectively addresses the borough's housing needs while upholding national planning policies. The release of Green Belt land, including at Crews Hill, is supported by comprehensive evidence and justified within the broader context of sustainable development and strategic planning. | No | 01750 | Thompsons of Crews Hill Ltd |

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| **SP PL11: Crews Hill** | Glasgow Stud's concerns highlight several potential issues with the Local Plan's adherence to the National Planning Policy Framework (NPPF), particularly regarding the clarity and effectiveness of policies and the overall strategy for development. The Local Plan, as represented in figures 3.13 and 3.14, shows broad areas for development without detailed, specific allocations. This vagueness conflicts with NPPF requirements for clear, unambiguous policies. The site allocation maps and the unclear status of "white land" and other areas potentially compromise the plan's effectiveness and transparency. Glasgow Stud's land is significantly impacted by the current proposals. The Regulation 19 Plan labels large portions of their land as part of "Whitewebbs Park," which the Trust believes may be an error. The proposed access routes and their safety are also questioned, indicating a lack of thorough engagement with site-specific details and concerns. | The Local Plan provides a clear framework for development through the Crews Hill Topic Paper and Site Allocation Topic Paper. Figures 3.13 and 3.14 offer a strategic overview of development areas, while acknowledging that detailed allocations will be further refined through Supplementary Planning Documents (SPDs). This approach aligns with NPPF guidelines, which emphasize the need for policies to be clearly written and unambiguous while allowing for detailed site-specific plans to be developed in subsequent stages. | No | 01869 | The Glasgow Stud |
| **SP PL11: Crews Hill** | Glasgow Stud on behalf of the board of trustees criticizes the Local Planning Authority (LPA) for inadequate and unresponsive engagement, contrary to the NPPF's expectation for early, proportionate, and effective engagement. They highlight that their attempts to seek clarification from the LPA have been met with insufficient responses, further complicating their ability to support the plan effectively. | The Local Plan provides a clear framework for development through the Crews Hill Topic Paper and Site Allocation Topic Paper. Figures 3.13 and 3.14 offer a strategic overview of development areas, while acknowledging that detailed allocations will be further refined through Supplementary Planning Documents (SPDs). This approach aligns with NPPF guidelines, which emphasize the need for policies to be clearly written and unambiguous while allowing for detailed site-specific plans to be developed in subsequent stages. | No | 01869 | The Glasgow Stud |
| **SP PL11: Crews Hill** | The Trust raises concerns about the suitability of proposed infrastructure, particularly regarding access roads and transport links. They assert that existing infrastructure is insufficient for the proposed development, and the suggested upgrades would entail significant environmental impacts. | The Local Plan provides a clear framework for development through the Crews Hill Topic Paper and Site Allocation Topic Paper. Figures 3.13 and 3.14 offer a strategic overview of development areas, while acknowledging that detailed allocations will be further refined through Supplementary Planning Documents (SPDs). This approach aligns with NPPF guidelines, which emphasize the need for policies to be clearly written and unambiguous while allowing for detailed site-specific plans to be developed in subsequent stages. | No | 01869 | The Glasgow Stud |
| **SP PL11: Crews Hill** | The Trust criticizes the lack of effective equalisation strategies and the reliance on commercial agreements among developers. They highlight that the large size of their site and the current planning proposals make it unlikely that satisfactory commercial agreements can be reached, complicating development plans. | The Local Plan provides a clear framework for development through the Crews Hill Topic Paper and Site Allocation Topic Paper. Figures 3.13 and 3.14 offer a strategic overview of development areas, while acknowledging that detailed allocations will be further refined through Supplementary Planning Documents (SPDs). This approach aligns with NPPF guidelines, which emphasize the need for policies to be clearly written and unambiguous while allowing for detailed site-specific plans to be developed in subsequent stages. | No | 01869 | The Glasgow Stud |
| **SP PL11: Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride expresses concerns about the viability of achieving the 20% BNG target set by Policy PL11, suggesting it may not align with the viability testing conducted in the 2023 Whole Plan Viability Update. The corporation supports the release of Crews Hill from the Green Belt to enable sustainable development but emphasizes the need for the development to be viable over the long term. They recommend revising the BNG requirement in Policy PL11 from 20% to 10%, with an encouragement to exceed this where possible, to align with viability assessments and ensure the policy is deliverable. Their representation advocates for greater flexibility in overall development costs, including BNG, to ensure that the plans are viable and projects can proceed within the expected timeframes. Their recommendations aim to make the Enfield Local Plan more practical and aligned with viability studies, ensuring that it remains effective and deliverable throughout the plan period. | Comments noted. The Enfield Viability Update acknowledges the importance of balancing environmental goals with development viability. While the update generally supports a 10% BNG as a baseline in the viability assessments, the Local Plan's target of 20% BNG reflects Enfield's broader sustainability ambitions. However, the Plan allows for flexibility through the Viability Tested Route (VTR), where site-specific conditions justify a lower BNG, ensuring that development remains feasible while striving to achieve higher environmental standards where possible. The Local Plan's 20% BNG target is aspirational, aligning with Enfield's sustainability goals, but it includes mechanisms to ensure that development remains viable, reflecting the realities outlined in the Viability Update. This flexible approach allows for adjustments based on specific site conditions, ensuring that both environmental and economic objectives are met. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SP PL11: Crews Hill** | Wolden Garden Centre supports the removal of Crews Hill from the Green Belt to allow for residential and mixed-use development, particularly around the Crews Hill station area, which they believe would bring environmental and economic benefits. However, they raise concerns about the viability of the 20% Biodiversity Net Gain (BNG) and 50% affordable housing targets, arguing that these requirements may hinder development if not adjusted to reflect site-specific circumstances. They recommend reducing the BNG target to 10% to align with viability assessments and adopting a flexible approach to the 50% affordable housing target, especially | Comments noted. The Crews Hill Topic Paper emphasizes the importance of the 20% BNG target for enhancing the environmental quality of the Crews Hill area. The Enfield Viability Update acknowledges the importance of balancing environmental goals with development viability. While the update generally supports a 10% BNG as a baseline in the viability assessments, the Local Plan's target of 20% BNG reflects Enfield's broader sustainability ambitions. However, the Plan allows for flexibility through the Viability Tested Route (VTR), where site-specific conditions justify a lower BNG, ensuring that development remains | No | 01887 | Wolden Garden Centre Ltd |

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| | in the early phases of development, to ensure projects remain viable. They suggest viewing the estimated housing capacity for the Wolden Garden Centre site as a minimum, advocating for higher density development near Crews Hill station to optimize land use. | feasible while striving to achieve higher environmental standards where possible. The Local Plan's 20% BNG target is aspirational, aligning with Enfield's sustainability goals, but it includes mechanisms to ensure that development remains viable, reflecting the realities outlined in the Viability Update. This flexible approach allows for adjustments based on specific site conditions, ensuring that both environmental and economic objectives are met. The Enfield Viability Update acknowledges the challenges and provides flexibility through the Viability Tested Route (VTR), allowing adjustments where site-specific viability is constrained. The Viability Update supports the flexibility in the 50% affordable housing target, ensuring that developments can remain viable by adjusting targets based on specific site conditions. These flexible approaches ensure that the goals of environmental enhancement and affordable housing are balanced with the practical realities of site-specific viability. | | | |
| **SP PL11: Crews Hill** | Wolden Garden Centre supports the principle of BNG but notes that the Viability Update uses a 10% BNG assumption rather than the 20% stated in Policy PL11. They suggest that the Local Plan should either adopt the 10% BNG target for consistency or rerun viability appraisals using the 20% figure. They stress the importance of ensuring that the Crews Hill development remains viable over the plan period and that flexibility in overall development costs, including BNG, is crucial. They recommend revising Policy PL11 to require a minimum of 10% BNG, with the opportunity to exceed this figure, aligning with the viability evidence. They advocate for greater flexibility in development costs to ensure that the ambitions for Crews Hill are effective and deliverable over the plan period, in line with the soundness tests of the National Planning Policy Framework (NPPF). | Comments noted. The Crews Hill Topic Paper emphasizes the importance of the 20% BNG target for enhancing the environmental quality of the Crews Hill area. The Enfield Viability Update acknowledges the importance of balancing environmental goals with development viability. While the update generally supports a 10% BNG as a baseline in the viability assessments, the Local Plan's target of 20% BNG reflects Enfield's broader sustainability ambitions. However, the Plan allows for flexibility through the Viability Tested Route (VTR), where site-specific conditions justify a lower BNG, ensuring that development remains feasible while striving to achieve higher environmental standards where possible. The Local Plan's 20% BNG target is aspirational, aligning with Enfield's sustainability goals, but it includes mechanisms to ensure that development remains viable, reflecting the realities outlined in the Viability Update. This flexible approach allows for adjustments based on specific site conditions, ensuring that both environmental and economic objectives are met. | No | 01887 | Wolden Garden Centre Ltd |
| **SP PL11: Crews Hill** | Wolden Garden Centre Limited raises concerns about the financial viability of development in Crews Hill, particularly given the high costs associated with infrastructure contributions, affordable housing, and the Community Infrastructure Levy (CIL). They note that the current viability assessment classifies development in Crews Hill as "marginal."<br>Flexibility in Policy: The representation suggests that greater flexibility in infrastructure and affordable housing requirements is necessary to ensure that development is viable and can proceed, especially in the early phases. They recommend adjusting infrastructure requirements to reflect scheme viability and propose a more flexible approach to affordable housing, particularly for larger dwellings. They also suggest that alternative residential models, such as care homes and Build to Rent (BTR) housing, should be explicitly supported within the Site Allocation. Their representation advocates for a potential reduction in Section 106 contributions and a revised CIL rate specifically for Crews Hill to support early-stage viability and encourage development. | Comments noted. The Enfield Viability Update recognizes the challenges in development viability, particularly in areas like Crews Hill, where the viability is classified as "marginal." The update supports a flexible approach, allowing adjustments to infrastructure contributions and affordable housing targets through the Viability Tested Route (VTR). This approach ensures that developments remain feasible, particularly in the early phases, by considering site-specific economic realities while striving to meet the overall objectives of the Local Plan. | No | 01887 | Wolden Garden Centre Ltd |
| **SP PL11: Crews Hill** | Wolden Garden Centre supports the removal of the Crews Hill area from the Green Belt to allow for residential and mixed-use development. They believe this will optimize land use around Crews Hill station, providing significant environmental and economic benefits. They raise concerns about the financial viability of the proposed developments, particularly due to the high costs associated with infrastructure contributions, affordable housing, and CIL rates. They note that these requirements may make development in Crews Hill, which is classified as "marginal" in viability, less feasible. They advocate for greater flexibility in infrastructure contributions and affordable housing requirements to ensure that development remains viable, especially in the early phases. They suggest that the housing capacity estimate for the Wolden Garden Centre site should be viewed as a minimum, advocating for higher density development to optimize the site's potential. They recommend modifying policies to include provisions for alternative residential models, such as Build to Rent (BTR) and care homes, to support overall scheme viability. | Comments noted. The Enfield Viability Update acknowledges the marginal viability of certain developments, including those in Crews Hill. However, the Plan incorporates a flexible approach through the Viability Tested Route (VTR), allowing for adjustments to infrastructure contributions and affordable housing targets based on specific site conditions. This flexibility ensures that developments can proceed feasibly while still meeting broader strategic goals. This approach balances the need for economic viability with the requirements for sustainable development. | No | 01887 | Wolden Garden Centre Ltd |

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| **SP PL11: Crews Hill** | Wolden Garden Centre supports BNG but highlights a discrepancy between the Local Plan's requirement of 20% BNG and the 10% used in the viability assessments. They argue that this inconsistency could impact the deliverability of the policy. They stress that for the Local Plan to be sound, it must be viable and deliverable over the plan period, suggesting that flexibility in development costs, including BNG, is essential. They recommend amending Part 17 'K' of Policy PL11 to require a minimum of 10% BNG, with opportunities to exceed this where viable. They suggest that greater flexibility in development costs will improve the likelihood of land coming forward for development, ensuring the plan's effectiveness and soundness according to the National Planning Policy Framework (NPPF). | Comments noted. The Crews Hill Topic Paper emphasizes the importance of the 20% BNG target for enhancing the environmental quality of the Crews Hill area. The Enfield Viability Update acknowledges the importance of balancing environmental goals with development viability. While the update generally supports a 10% BNG as a baseline in the viability assessments, the Local Plan's target of 20% BNG reflects Enfield's broader sustainability ambitions. However, the Plan allows for flexibility through the Viability Tested Route (VTR), where site-specific conditions justify a lower BNG, ensuring that development remains feasible while striving to achieve higher environmental standards where possible. The Local Plan's 20% BNG target is aspirational, aligning with Enfield's sustainability goals, but it includes mechanisms to ensure that development remains viable, reflecting the realities outlined in the Viability Update. This flexible approach allows for adjustments based on specific site conditions, ensuring that both environmental and economic objectives are met. | No | 01887 | Wolden Garden Centre Ltd |
| **SP PL11: Crews Hill** | Wolden Garden Centre highlights concerns regarding the viability of development in Crews Hill, particularly due to the costs associated with infrastructure contributions, affordable housing, and the Community Infrastructure Levy (CIL). They note that current assessments categorize Crews Hill as a "marginal" area in terms of development viability. They suggest modifying the Local Plan to allow for more flexibility in infrastructure contributions and affordable housing requirements, proposing a potential area-wide CIL adjustment for Crews Hill to improve early-phase viability. They recommend that the plan explicitly support alternative residential models such as care homes, Build to Rent (BTR) housing, and other specialist accommodations to enhance overall scheme viability. | Comments noted. The Crews Hill Topic Paper outlines the importance of strategic infrastructure to support sustainable growth in Crews Hill. The Plan allows for flexibility in infrastructure and affordable housing contributions to ensure developments remain viable, particularly in early phases. The Viability Update confirms that developments in marginal areas like Crews Hill require a flexible approach. The Plan includes mechanisms to adjust contributions and support alternative housing models, ensuring that projects are financially feasible while meeting strategic goals. | No | 01887 | Wolden Garden Centre Ltd |
| **SP PL11: Crews Hill** | Landvest Crews Hill Ltd argue that despite significant work already done, including a Spatial Framework for Crews Hill, the plan's requirement for a Supplementary Planning Document (SPD) before supporting development is inconsistent with national policy. They argue that planning applications should be assessed on their own merits rather than waiting for an SPD, as per the NPPF guidance on prematurity. Additionally, the need to reprovide equestrian and horticultural uses in new locations is deemed impractical and likely to affect viability negatively, making this aspect of the plan unjustifiable. Lastly, the requirement for a 20% biodiversity net gain is considered unsubstantiated, with a request to revise it to a minimum of 10% to align with current legislation. | The requirement for a Supplementary Planning Document (SPD) in Policy SS1 is essential to ensure that development in the Crews Hill Placemaking Area is well-coordinated and aligned with the strategic objectives of the Local Plan. This approach meets the tests of soundness: it is positively prepared by aligning with the Local Plan's vision; justified as it addresses the complexity and scale of the development with detailed guidance; effective in providing clarity and reducing uncertainties; and consistent with national policy, which supports detailed planning guidance. The SPD will build on the existing Spatial Framework and evidence base, ensuring that all aspects of development are comprehensively addressed, and facilitates a structured approach to delivering sustainable growth in Crews Hill. | No | 01894 | Landvest Crews Hill Ltd |
| **SP PL11: Crews Hill** | Landvest Crews Hill Ltd generally supports the Enfield Local Plan's strategic vision for Crews Hill but raises concerns about the viability of the Parkview Nursery site. They propose a medium-density residential development aligned with the Council's framework but argue that the requirement for a Supplementary Planning Document (SPD) before planning approval could cause delays. They recommend reducing the affordable housing target from 50% to 40% and lowering the biodiversity net gain (BNG) target from 20% to the statutory 10% to ensure financial feasibility. They also support the release of Green Belt land for development and request more flexibility in the planning policies to encourage timely housing delivery. | The Council's housing and viability strategies outlined in the Enfield Housing Topic Paper (2024) and the Enfield Viability Update support the delivery of 50% affordable housing as a crucial part of addressing Enfield's housing needs, particularly in areas like Crews Hill. The Crews Hill Topic Paper (2024) identifies this area as a key site for sustainable growth, with the potential to deliver significant housing while enhancing green infrastructure. The Viability Update confirms that the 50% affordable housing target is viable across a range of developments, but the Council remains open to site-specific viability testing where justified. Regarding biodiversity net gain (BNG), while the Council has set an ambitious 20% BNG target, it recognizes that national policy requires only 10%, and flexibility can be applied based on local site conditions, ensuring the balance between environmental sustainability and development viability. The SPD requirement is designed to ensure comprehensive, well-planned development, but the Council remains committed to working with developers to avoid unnecessary delays. | No | 01894 | Landvest Crews Hill Ltd |
| **SP PL11: Crews Hill** | Landvest Crews Hill Ltd expresses concerns about Policy PL11 (Crews Hill). While the inclusion of a masterplan is supported, the respondent argues that requiring its formal adoption as an SPD before planning permissions is too restrictive. They also query the need to relocate equestrian and horticultural uses, suggesting that it would be impractical and affect viability. Additionally, they recommend reducing the biodiversity net gain (BNG) requirement from 20% to the statutory 10%. | The Council's housing and viability strategies outlined in the Enfield Housing Topic Paper (2024) and the Enfield Viability Update support the delivery of 50% affordable housing as a crucial part of addressing Enfield's housing needs, particularly in areas like Crews Hill. The Crews Hill Topic Paper (2024) identifies this area as a key site for sustainable growth, with the potential to deliver significant housing while enhancing green infrastructure. The Viability Update confirms that the 50% affordable housing target is viable across a range of | No | 01894 | Landvest Crews Hill Ltd |

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| | | developments, but the Council remains open to site-specific viability testing where justified. Regarding biodiversity net gain (BNG), while the Council has set an ambitious 20% BNG target, it recognizes that national policy requires only 10%, and flexibility can be applied based on local site conditions, ensuring the balance between environmental sustainability and development viability. The SPD requirement is designed to ensure comprehensive, well-planned development, but the Council remains committed to working with developers to avoid unnecessary delays. | | | |
| **SP PL11: Crews Hill** | Berkeley Homes (North East London) Ltd supports the allocation of land at Crews Hill for residential-led mixed-use development as outlined in Strategic Policy PL11. They are particularly supportive of the Local Plan's overall vision and the designation of Crews Hill for growth. However, Berkeley suggests modifications to Site Allocation SA11.2 to improve its effectiveness and ensure soundness. They propose increasing the estimated housing capacity for SA11.2 from 200 to approximately 350 homes, considering compensatory measures for the existing SINC and enhanced development potential on adjacent land. Berkeley also recommends including provisions in both Policy SA11.2 and Policy PL11 to address compensatory measures and the broader scope of a comprehensive masterplan, which should encompass retained Green Belt areas beyond the immediate development zone. These modifications aim to provide flexibility and ensure that the plan can accommodate the full potential of the site while addressing ecological and compensatory needs. | The Council acknowledges and appreciates Berkeley's support for the Crews Hill allocation as a sustainable growth area. The Council values Berkeley's detailed analysis and proposed modifications aimed at refining the site's development capacity and addressing ecological considerations. The Council is committed to ensuring that the Local Plan is both robust and responsive to the needs and concerns of stakeholders. In particular, the Council recognizes the importance of addressing the compensatory measures for the SINC and the broader implications for Green Belt land surrounding the Crews Hill Placemaking Area. The Council is committed to collaborating on a Statement of Common Ground (SoCG) with Berkeley Homes and other stakeholders. This will facilitate a shared understanding and agreement on the proposed modifications and the effective implementation of the Local Plan, ensuring it meets both the current and future needs of the Borough while addressing all ecological and planning considerations. | No | 01916 | Berkeley Homes (North East London) Ltd |
| **SP PL11: Crews Hill** | Berkeley Homes (North East London) Ltd ('Berkeley') has expressed support for the allocation of land at Crews Hill under Strategic Policy PL11, recognizing its potential for a residential-led, mixed-use development around an under-utilized train station. Berkeley supports the overarching aims of the Local Plan and the decision to allocate Crews Hill for growth, highlighting several key points in their response: 1) Support for Allocation and Justification: Berkeley agrees with the allocation of Crews Hill for development, citing the area's suitability for new housing and infrastructure due to its underutilized transport link and urbanized character. They emphasize that the location aligns with National Planning Policy Framework (NPPF) objectives for sustainable development, efficient land use, and the creation of new settlements. 2) Land Ownership and Constraints: Berkeley controls several land parcels within Crews Hill, including Owls Hall Estate (Parcel SA11.1) and Enfield Garden Centre. They note that while parts of Owls Hall Estate are greenfield, they are well-contained within the landscape, and the proposed Green Belt revisions are appropriate. 3) Spatial Framework and Masterplanning: Berkeley supports the Local Plan's approach of using an illustrative spatial framework as a basis for detailed masterplanning through a subsequent SPD. They argue that the spatial framework should remain illustrative and that the detailed masterplan will provide the necessary granularity. 4) Site-Specific Modifications: Housing Capacity: Berkeley suggests modifying the estimated capacity of SA11.1 from 800 to 650 homes based on their initial masterplanning. They believe this adjustment aligns with constraints and infrastructure requirements, though they acknowledge that further masterplanning will refine this estimate.<br>Infrastructure Requirements: Berkeley proposes changes to infrastructure requirements, including the removal of a requirement for a new public transport bridge over the railway and the flexibility in locating a primary school. They argue that the current infrastructure requirements are overly prescriptive and should be deferred to the masterplanning process to avoid unnecessary constraints.<br>Delivery and Phasing: Berkeley supports the proposed phasing strategy for Crews Hill, which aims for early delivery and phased development based on land ownership and infrastructure readiness. They view Owls Hall Estate as a key parcel for early-phase development, which will contribute to achieving the overall housing targets and infrastructure delivery. Berkeley is committed to collaborating with the Council through the masterplanning and SPD processes to ensure the successful and timely delivery of Crews Hill. They emphasize the importance of a | The Council appreciate Berkeley Homes' continued support for the allocation of land at Crews Hill under Strategic Policy PL11. Their endorsement of the Crews Hill allocation as a residential-led mixed-use development, centered around an under-utilized train station, aligns with the overarching objectives of Enfield's Local Plan. The Council concurs with Berkeley Homes that the allocation of Crews Hill is strategically sound. The area's potential to provide much-needed housing and community infrastructure is recognized, and the principles outlined in the National Planning Policy Framework (NPPF) regarding sustainable growth and effective land use strongly support this allocation. The Local Plan's justification for Crews Hill as a location for development is robust and aligns with both regional and national planning policies. The Councikl acknowledges Berkeley's suggestion to adjust the estimated housing capacity for Parcel SA11.1 from 800 to 650 homes. However, the spatial frameworks and ongoing planning work demonstrate that the initially suggested capacity is achievable. Further masterplanning will refine these estimates, and planning applications will provide detailed proposals for review. Therefore, the Council believe that no modification to the capacity figure is necessary to ensure the plan's soundness. Regarding the suggested modifications to infrastructure requirements: 1) Public Transport Bridge: The requirement for a new public transport bridge over the railway is based on preliminary assessments and the need for effective connectivity. While the Council acknowledge that alternative solutions might exist, the current policy is designed to identify potential infrastructure needs early. The detailed Infrastructure Delivery Plan (IDP) and subsequent masterplanning will address the feasibility and necessity of specific infrastructure items. Therefore, the inclusion of the bridge in the policy at this stage ensures that essential infrastructure considerations are not overlooked. 2) Primary School Location: The Council recognize the flexibility suggested by Berkeley regarding the location of the primary school. While the policy currently specifies a requirement for a new primary school, we agree that the precise location and provision details can be refined through the masterplanning process. This will allow for a more integrated approach, aligning educational facilities with other community infrastructure effectively. 3) The Council supports the phased approach to development outlined in the Local Plan and acknowledges the role of early phases in unlocking the full potential of Crews Hill. Berkeley's commitment to working within this framework to ensure timely delivery is appreciated. The phased approach will help achieve the overall housing targets while accommodating necessary infrastructure. To ensure alignment and address any remaining | No | 01916 | Berkeley Homes (North East London) Ltd |

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| | flexible policy environment to facilitate phased development and achieve the Local Plan's objectives. | concerns, we propose working together on a Statement of Common Ground (SoCG). This collaborative effort will help resolve outstanding issues, finalize the details of infrastructure requirements, and ensure that the masterplanning process supports both the Council's objectives and Berkeley's development goals. | | | |
| **SP PL11: Crews Hill** | Alder King Property Consultants on behalf of Leonard F Jollye (Brookmans Park) Ltd supports the proposed residential development at Crews Hill, including the removal of land from the Green Belt to facilitate the development. They opposes the requirement for a 20% BNG in Policy PL11, arguing that it is inconsistent with national legislation, which mandates only 10% BNG. They recommend modifying Policy PL11 to align with national requirements by reducing the BNG target to 10%, which is considered more reasonable and in line with the Environment Act. | Comments noted. The Council acknowledges that national legislation under the Environment Act sets a statutory minimum of 10% BNG. However, the Crews Hill Topic Paper (2024) outlines the Council's commitment to ambitious biodiversity enhancement as part of its Nature Recovery Network, recognising Crews Hill's ecological significance. The higher 20% target reflects local needs and opportunities to deliver enhanced biodiversity gains, which are crucial for maintaining the environmental integrity of the area. The Enfield Viability Update has also assessed the impact of this higher BNG target on development feasibility and determined that it is achievable without significantly affecting the financial viability of projects. The Council remains open to flexibility in applying the 20% BNG requirement where site-specific viability challenges arise, ensuring that both biodiversity objectives and development viability can be balanced. We appreciate your feedback and will continue to assess site-specific needs in line with national legislation and local priorities. | No | 01925 | Leonard F Jollye (Brookmans Park) |
| **SP PL11: Crews Hill** | Rockwell London Ltd, a housebuilder with interests in the Crews Hill Allocation (Policy PL11, SA 11.6), supports the plan's vision for delivering new homes and infrastructure at Crews Hill. They welcome the Green Belt release and the plan's ambition to create a sustainable new community. Rockwell has engaged with the Council through Developer Forums and is committed to working with other promoters within SA11.6. However, Rockwell raises concerns about the viability of the plan, the timing and scope of the Supplementary Planning Document (SPD), and transparency regarding delivery assumptions. They believe the plan can be improved through modifications, including refining the SPD, reviewing viability evidence, including a detailed housing trajectory, and ensuring continued commitment from Enfield Estates. | The Enfield Viability Update (2024) has been prepared to address and substantiate the viability assumptions for the Crews Hill allocation. This appraisal confirms that the viability of the development is robust and that the infrastructure requirements and associated costs have been carefully evaluated. The update demonstrates that the expected infrastructure contributions are feasible and aligned with current market conditions. The Council is committed to continually reviewing and refining these assumptions to ensure they reflect any changes in the economic landscape and development feasibility. The Council acknowledge the importance of the SPD in guiding the detailed implementation of the Crews Hill development. The Council is working to expedite the preparation of the SPD in parallel with the Local Plan process to ensure timely delivery. While specific adoption timelines may be subject to consultation and approval processes, we are prioritising the preparation of the SPD to minimize any delays. This approach will help ensure that all stakeholders, including Rockwell, have clarity on the design and phasing requirements. The Enfield Local Plan includes a detailed housing trajectory, which outlines the expected delivery rates and milestones for the Crews Hill allocation. This trajectory has been developed in conjunction with the viability evidence and is intended to provide a transparent view of how the housing targets will be met throughout the plan period. The Council is committed to maintaining transparency and will continue to provide updated information as necessary. The Council acknowledge the point regarding the importance of cooperation with Enfield's Property Services and are actively engaging with all key stakeholders, including Enfield's property service to ensure that the delivery of the Crews Hill development aligns with the broader vision and objectives of the Local Plan. Our ongoing discussions are aimed at addressing any issues that may impact the timely delivery of the project. | No | 01932 | Rockwell London Ltd for Kings Oak |
| **SP PL11: Crews Hill** | Rockwell's concerns regarding Policy PL11 center on several key points: 1) Historical and Current Context: Rockwell acknowledges the historical and evolving commercial nature of the Crews Hill area but supports the strategic vision for its redevelopment. They emphasize that certain sites, such as Kings Oak Equestrian Centre, could potentially be redeveloped immediately if conditions allow. 2) Coordination and Delivery: While Rockwell supports the holistic approach for Crews Hill, they express concerns about the potential impact of the proposed masterplanning and coordination requirements on delivery timelines and viability. They suggest that a more flexible approach might be necessary to address the complex land ownership issues and expedite development. 3) Viability Issues: Rockwell raises significant concerns about the viability of the Crews Hill allocation as assessed in the Whole Plan Viability Update (WPVU) 2023. They argue that the current assumptions regarding S106 contributions and affordable housing targets | The Council understands the importance of a coordinated approach to masterplanning given the complex land ownership and infrastructure needs at Crews Hill. The requirement for comprehensive masterplans and the preparation of a Supplementary Planning Document (SPD) is designed to ensure a cohesive and sustainable development. This approach is crucial for avoiding piecemeal development and ensuring that infrastructure and community needs are addressed comprehensively. The Council is committed to expediting the SPD's preparation alongside the Local Plan to minimize delays and provide clarity on design and phasing requirements. The Council acknowledge the concerns regarding the viability of the Crews Hill allocation. Work on the Infrastructure Development Plan (IDP) and Delivery Strategy will provide detailed insights into the scope and cost of required infrastructure, informing necessary adjustments. The Council is also exploring how the Community Infrastructure Levy (CIL) might be utilized to | No | 01932 | Rockwell London Ltd for Kings Oak |

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| | may render the site borderline non-viable. They suggest that adjustments to the S106 costs and affordable housing targets are necessary to improve viability and ensure that the development can proceed as planned. 4) Recommendations for Improvement: To address these concerns, Rockwell proposes several modifications, including: 1) Exempting the Crews Hill Growth Area from Community Infrastructure Levy (CIL) or significantly reducing the rate. 2) Adopting a more nuanced approach to S106 costs based on individual sub-parcels rather than a flat rate. 3) Setting a target of 40% affordable housing for the Growth Area, with flexibility to adjust based on site-specific viability assessments. | address local needs and alleviate some financial pressures associated with S106 contributions. The Council recognizes the need for flexibility in affordable housing provision. As detailed in the Enfield Viability Update (2023), the policy framework allows for adjustments based on site-specific viability assessments. This ensures that affordable housing targets are realistic and achievable without compromising the overall viability of development. Specifically, the update emphasizes that affordable housing provision can be tailored based on individual site assessments and market conditions, reinforcing the flexibility needed to address site-specific challenges. The suggested modifications are not deemed necessary to make the plan sound. The existing framework, including the IDP and viability assessments, and emerging SPD, is designed to ensure that development is both effective and deliverable. The Council value Rockwell's constructive engagement and remain committed to working collaboratively to resolve these issues and ensure the successful delivery of Crews Hill. | | | |
| **SP PL11: Crews Hill** | Rockwell's concerns regarding Policy PL11 focus on the requirement for a Supplementary Planning Document (SPD) to be adopted before granting planning permission within Crews Hill. They argue that this stipulation could significantly delay housing delivery, pushing permissions to mid-2028 and extending completions to around 2031, thus undermining the plan's effectiveness. Additionally, they question the appropriateness of using an SPD for matters that may be better suited to a Development Plan Document, fearing that it could introduce new requirements and financial burdens not considered in the plan's viability assessment, potentially exacerbating viability issues and affecting the delivery of affordable housing and other policies. | The Council acknowledges Rockwell’s concerns regarding the preparation of the Supplementary Planning Document (SPD) for Crews Hill and Chase Park. However, the Council maintain that a comprehensive SPD is essential to ensure a coordinated and cohesive approach to the development of these significant placemaking areas. The requirement for an SPD to be prepared and approved before development ensures that all aspects of the development, including infrastructure, design, and phasing, are thoroughly planned and integrated. This approach helps prevent piecemeal development and ensures that the new communities are developed in a manner that aligns with the overall vision and strategic objectives of the Local Plan. While the SPD will expand upon existing policy requirements, its purpose is to provide detailed guidance rather than introducing entirely new requirements or financial burdens. The Council is committed to expediting the preparation of the SPD in parallel with the Local Plan process to minimize delays and ensure clarity for all stakeholders. This coordinated approach is crucial for delivering the high-quality, sustainable communities envisioned for Crews Hill and Chase Park. | No | 01932 | Rockwell London Ltd for Kings Oak |
| **SP PL11: Crews Hill** | Rockwell's concerns regarding Policy PL11's housing mix focus on the lack of clarity about the required housing types and tenures for different parts of the Crews Hill Place Making Area. While the policy emphasizes family housing, the specific mix is left to future Supplementary Planning Documents (SPDs), potentially leading to uncertainty and conflicts for developers. They worry that high-density targets along Theobalds Park Road (SA11.6) might not align with the policy's family housing aspirations, risking refusals of applications that fail to meet future SPD requirements. Rockwell suggests minor policy amendments to ensure that housing mix and densities are clear and align with overall delivery goals, including affordable and specialist housing, to prevent conflicts and improve policy effectiveness. | Comments noted. The Enfield Housing Topic Paper 2024 outlines that the Borough's strategy includes a variety of housing types to address the diverse needs of its population, with an emphasis on family housing in strategic growth areas like Crews Hill. This is aligned with the broader aim to meet identified housing needs, as set out in the Enfield Local Housing Needs Assessment 2020, which emphasizes the requirement for a balanced housing mix including affordable, family, and specialist housing. Policy PL11 reflects this strategy by prioritizing the delivery of family homes but recognizes that specific densities and housing types will be detailed in future SPDs. The intent is to ensure that overall objectives are met while allowing for flexibility in application to respond to evolving needs and site-specific conditions. The Crews Hill Topic Paper 2024 confirms that while individual site densities are being considered, the overarching aim is to provide a balanced mix that meets the Borough's identified needs without rigidly defining every detail at this stage. The future SPD will provide clear guidance on housing mix and density requirements, balancing the need for flexibility with the requirement to meet policy goals. The SPD will expand on the principles outlined in the local plan, providing further clarity on how to achieve the desired outcomes while accommodating practical development considerations. While the current policy framework leaves some details to the SPD, it is designed to be consistent with the broader strategic objectives of the Borough. The suggested minor amendments to Policy PL11 could provide additional clarity, but the core approach—combining strategic policy with detailed SPD guidance—remains sound and aligned with evidence from the Enfield Housing Topic Paper and Local Housing Needs Assessment. | No | 01932 | Rockwell London Ltd for Kings Oak |
| **SP PL11: Crews Hill** | Rockwell's concerns regarding Policy PL11's treatment of equestrian uses focus on the retention and reprovision requirements specified in paragraph 9. Rockwell highlights that the policy requires the retention of certain existing rural uses, such | The Crews Hill Topic Paper 2024 recognises the importance of integrating existing uses with new development to maintain the area’s character and support local businesses. It acknowledges that while the policy supports reprovision, specific | No | 01932 | Rockwell London Ltd for Kings Oak |

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| | as equestrian facilities, with an option for reprovision in alternative locations if necessary. However, they note that there has been no prior discussion about finding alternative locations for the Kings Oak Equestrian Centre, which is a privately operated business slated for residential development. Rockwell's concern is that this criterion may not be applicable to Kings Oak, and they seek clarification on the policy's implications for their site, emphasizing the need for a more specific approach to address the reprovision of such facilities. | discussions with operators like Kings Oak Equestrian Centre have not yet commenced. The Council is committed to engaging with the operators of Kings Oak Equestrian Centre to discuss their needs and explore suitable relocation options within the Crews Hill area. This approach will ensure that development aligns with the broader vision outlined in the Topic Paper and respects the operational requirements of existing businesses. Furthermore, the forthcoming Supplementary Planning Document (SPD) will play a crucial role in detailing how such reprovision should be managed. The SPD will provide comprehensive guidance on how existing rural uses, including equestrian facilities, can be integrated into the development framework, ensuring that all stakeholders have clarity on how these uses will be addressed. This will help align the policy's intentions with practical implementation strategies and support the seamless integration of existing uses within the new development areas. The Council's approach will involve reviewing potential sites for reprovision and ensuring that any relocation efforts are consistent with the objectives of the SPD, which will be developed in parallel with the Local Plan process to provide timely and coordinated guidance. | | | |
| **SP PL11: Crews Hill** | LBE SPS supports the Council's vision for creating high-quality, well-functioning places, including Crews Hill. They endorse the CHPA's goal of delivering 5,500 homes but suggest flexibility to exceed this target. They emphasize the importance of a unified housing figure across documents and collaboration between landowners and the Council. They recommend a flexible masterplanning approach to avoid delays, support residential capacity targets, and stress the need for detailed phasing information. They advocate for the protection of ecologically sensitive habitats and propose using LBE Landowner assets for off-site Biodiversity Net Gain if necessary. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SP PL11: Crews Hill** | LBE SPS emphasizes the need to prioritize activities related to development phasing, infrastructure costs, and scheme viability. They believe that existing policies and the CH Spatial Framework provide adequate guidance for detailed design work. They recommend that the Design Review Panel (DRP) include design codes in their reviews. The comprehensive evidence base, including various topic papers and assessments, is deemed sufficient for individual landowners or developers to start masterplanning. They also suggest reviewing key plans to allocate specific land uses within the CHPA proposed for Green Belt release. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SP PL11: Crews Hill** | LBE SPS highlights limited information on phasing for the CHPA in the draft Local Plan and evidence base. They suggest splitting the area into phased parcels, recommending Phase 1 should include land west of the railway line (SA11.1 and SA11.2). They propose that Crews Hill Golf Course, Kings Oak Equestrian Centre, and Sunbeam Stud could come forward in the first 1-5 years. The "Development Sites Availability" section of the CH Spatial Framework should be updated to reflect these recommended timelines. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SP PL11: Crews Hill** | LBE SPS comments on the viability assessment emphasize the need for a comprehensive viability assessment as part of the plan-making process, in line with national policy. They acknowledge the draft Local Plan's Viability Assessment (August 2023) but recommend further review and updates post-Regulation 19 consultation. For CHPA, LBE SPS notes the early stage of design work and the need for additional details on viability, development, and infrastructure costs for the Local Plan examination. They suggest that increasing the number of units at CHPA, particularly at Crews Hill Golf Course, could improve the scheme's viability. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SP PL11: Crews Hill** | LBE SPS supports the Green Belt approach in the draft Local Plan, including the release of some Green Belt land at CHPA to meet development targets and deliver diverse housing, including affordable family homes. They endorse the Green Belt release plan outlined in the draft Local Plan and the CH Spatial Framework (page 77). Additionally, they commend the Green Belt Exceptional Circumstances Topic | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |

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| | Paper (2024) for providing a strategic-level justification for the boundary amendments, aligning with the NPPF. | | | | |
| **SP PL11: Crews Hill** | Tile Kiln Farm support the principle of Biodiversity Net Gain (BNG) enhancement but note a discrepancy in the '2023 Whole Plan – Viability Update,' which uses a 10% BNG figure for residential appraisals instead of the 20% required by Policy CR11. To ensure consistency with the viability assessment, Policy CR11 should either adopt a 10% BNG figure or re-run appraisals with the 20% figure. The 20% BNG is also referenced in Policy BG4 and its supporting text, which includes both 10% and 20% figures. We emphasize the importance of ensuring that the Crews Hill development remains viable and effective over the plan period, aligning with the 'Soundness' tests of the NPPF, given the long-term vision for creating a new sustainable community. | The requirement for a 20% biodiversity net gain reflects the borough's commitment to ambitious environmental targets and aligns with emerging national standards. The higher target supports Enfield's nature recovery plans, which have been recognized by DEFRA, and aims to address local biodiversity challenges. The Local Plan provides a clear rationale for this target and includes mechanisms for reviewing and adjusting requirements in response to specific development contexts and evidence. | No | 02001 | Tile Kiln Farm |
| **SP PL11: Crews Hill** | This site, located along the northern boundary of the Crews Hill Placemaking Area (CHPA), is less suitable for residential use due to M25 noise but presents an opportunity for intensified commercial and industrial development. This could accommodate existing businesses from the central CHPA area, allowing them to relocate and release their sites for residential development. Homewood Farm is well-suited for providing 'turnkey' commercial units, supporting business continuity while facilitating residential redevelopment. They support the release of Crews Hill from the Green Belt to foster a sustainable community and stress the importance of ensuring that the development remains viable and effective over the plan period, as per the NPPF's 'Soundness' tests. | Noted. We appreciate your feedback and will consider these points in preparing the Statement of Common Ground (SoCG). | No | 02001 | Tile Kiln Farm |
| **SP PL11: Crews Hill** | Thompsons of Crews Hill are concerned that the PL11 proposal will be detrimental to the local economy, leading to significant job losses, including around 100 jobs at Thompsons of Crews Hill. The unique character of Crews Hill, known as the "landscapers' mile" and attracting many visitors, would be lost. Additionally, the plan lacks clarity, certainty, and sufficient evidence for the exceptional circumstances required for Green Belt development. Many landowners and residents were not adequately consulted during the plan's preparation, raising concerns about its soundness and impact on livelihoods and the community. | Comments noted. The Enfield Local Plan (ELP) aims to balance the pressing need for housing with environmental sustainability and economic viability. The Crews Hill Topic Paper outlines how the area will retain its unique character while addressing housing demands. Exceptional circumstances for Green Belt development include the lack of alternative brownfield sites and significant housing needs. Infrastructure improvements and ecological protections are planned to mitigate impacts. Supported by a wealth of evidence, the ELP ensures sustainable development, enhancing connectivity and services, as detailed in the Exceptional Circumstances Topic Paper and supported by strategic infrastructure planning. For more detailed information, the evidence base can be accessed https://www.enfield.gov.uk/services/planning/evidence-base. | No | 05244 | Thompsons Garden Centre |
| **SP PL11: Crews Hill** | Warmerdam & Co (Crews Hill) Ltd notes a typographical error in Figure 3.14 of the Draft Enfield Local Plan (ELP), which incorrectly labels 'Burn Farm Ride' instead of the correct name, 'Burnt Farm Ride'. They suggest that this error be corrected to accurately reflect the name of the location. | Accepted. This is a typographical error and will be proposed as a minor modification. | No | 01730 | Warmerdam & Co (Crews Hill) Ltd |
| **SP PL11: Crews Hill** | CPRE London opposes the development of Green Belt land at Crews Hill (PL11), emphasizing its importance to the Metropolitan Green Belt and arguing that Enfield has sufficient brownfield land and existing major sites like Meridian Water for housing development. They state that Crews Hill, known for its plant nurseries and horticulture goods, is unsuitable for development, and urbanisation would adversely impact Sites of Importance for Nature Conservation at Crews Hill Golf Course and Glasgow Stud. Additionally, the Chain Walk Public Right of Way, Burnt Farm Ride Public Bridleway, and views from the Ridgeway would be compromised. Increased traffic would harm rural lanes, and the site is unlikely to meet the London Plan's requirements for non-car travel due to its proximity to the M25 and challenging topography for cycling infrastructure. | Comments noted. The Council acknowledges CPRE London's concerns regarding the development of Green Belt land at Crews Hill (PL11). The Enfield Local Plan aims to balance housing needs with environmental protection. According to the ELP Spatial Strategy and Overall Approach Topic Paper, allocating some Green Belt land is essential to meet housing targets sustainably. The Crews Hill Topic Paper 2024 provides detailed assessments ensuring developments are planned with environmental and community impacts in mind. The plan prioritizes brownfield sites where possible and ensures protection for significant green spaces to maintain the area's character and identity. | No | 01726 | CPRE London |
| **SP PL11: Crews Hill** | Enfield Road Watch raises concerns regarding the feasibility of proposed cycling routes in the Draft Local Plan, particularly around Crews Hill. They argue that gaps in cycling accessibility in the northwest borough, especially south of the M25, cannot be easily remedied. Their analysis of potential cycling routes (via Kings Oak Plain, The Ridgeway, and Hillyfields to Enfield Town) reveals steep gradients that exceed permissible limits outlined in LTN1/20, making these routes impractical for regular cycling use. Additionally, they criticize the Draft Local Plan's movement | Comments noted. However, the approach set out is informed by the Crews Hill Topic Paper (2024) and other evidence that support the local plan's approach to movement and connectivity. 1) Strategic Cycling and Connectivity Improvements: The Crews Hill Topic Paper highlights the council's ambition to improve cycling and walking infrastructure in the area through an active travel network. This includes dedicated cycleways and pedestrian paths that aim to connect Crews Hill to nearby centers, the rail station, and rural areas. While Enfield Road Watch | No | 01687 | Enfield Road Watch |

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| | and connectivity proposals, particularly Paragraph 18, which aims to achieve 75% of trips by non-car means. They argue that the proposed pedestrian and cycling connections (e.g., through Hilly Fields Park and Kings Oak Plain) are ineffective and unrealistic. Moreover, the plan's reliance on local centers and amenities to reduce long-distance travel is unsubstantiated and fails to comply with the London Plan's requirements for sustainable transport. Enfield Road Watch concludes that Policy PL11, particularly Paragraph 18, does not align with the London Plan's strategic transport goals and should be deleted from the Local Plan to ensure legal compliance and soundness. | emphasizes topographical challenges, the council recognizes these issues and is actively planning to address them through masterplanning and site-specific designs. 2) Transport Integration and Accessibility: The Crews Hill Topic Paper recognises that the existing rail station is underutilized and forms a crucial component of the broader sustainable transport strategy. The improvement of pedestrian and cycling routes is part of a larger effort to enhance connectivity to the station, making it a key node for non-car-based travel. This aligns with the London Plan's objectives by facilitating a shift towards public transport and reducing the reliance on cars for longer journeys. 3) Masterplanning for Feasibility: While Enfield Road Watch's concerns about gradients are valid, the council's strategy includes developing a detailed masterplan that will assess and mitigate these challenges where feasible. The topic paper indicates that the implementation of cycling and walking routes will be carefully planned to ensure compliance with national standards, such as LTN1/20, where possible, and create practical routes for residents. 4) Supporting Local Amenities: The Local Plan aims to develop local centers within Crews Hill, potentially reducing the need for long-distance travel. While Enfield Road Watch argues that the local centers may not achieve "self-sufficiency," the plan acknowledges that creating mixed-use areas with local services and amenities can encourage shorter, non-car-based trips, contributing to the overall sustainability of the development. 5) Alignment with the London Plan: The London Plan emphasizes the need for boroughs to achieve higher proportions of trips by non-car means, especially in outer London areas like Enfield. The Crews Hill Topic Paper and the evidence base suggest that the local plan is in general conformity with these policies by focusing on infrastructure investments and placemaking strategies that promote active travel and public transport. In summary, while the topographical challenges highlighted by Enfield Road Watch are acknowledged, the local plan provides a structured response through masterplanning and strategic investments in infrastructure. The council's approach aligns with London Plan policies, particularly in promoting sustainable transport options and enhancing local connectivity. Therefore, Policy PL11, including Paragraph 18, should remain in the plan with further emphasis on addressing the feasibility of proposed routes during the detailed design and implementation phases. | | | |
| **SP PL11: Crews Hill** | Enfield Road Watch opposes the removal of Green Belt status for sites in Policy PL11, arguing it contradicts the London Plan's requirement to improve, not develop, degraded Green Belt areas. Concerns include the potential for high car dependency, insufficient infrastructure for proposed developments, and the risk of urban sprawl. They emphasize the area's ecological and economic value, noting that the Crews Hill garden centers are crucial to the local economy. They also highlight uncertainties around the local center's delivery and its impact on sustainability and job loss. They consider policy PL11 should be deleted from the Plan. | Comments noted. The proposed policies for Chase Park and Crews Hill are supported by the Chase Park and Crews Hill Topic Papers 2024 which outlines comprehensive plans to enhance green spaces and maintain Enfield's character. The Enfield Recreation Mitigation Strategy 2023 ensures recreational needs are met, promoting sustainable transport and reducing car dependency. The Council's Exceptional Circumstances Topic Paper justifies Green Belt release by demonstrating unmet housing needs and a lack of alternative sites. The Enfield Housing Topic Paper 2024 details housing needs and strategic development goals. The ELP Spatial Strategy and Overall Approach ensures alignment with national and regional policies, promoting sustainable growth and infrastructure development. The Site Allocation Topic Paper for Regulation 19 discusses site-specific considerations and strategies to mitigate potential adverse impacts, ensuring responsible development. The Duty to Cooperate Statement confirms that Enfield Council has proactively engaged with neighboring boroughs and stakeholders to address housing needs before considering Green Belt sites, ensuring compliance with legal requirements. The plan is based on a comprehensive approach that recognises the Council's commitment to balanced development, addressing housing needs while preserving the essential characteristics of the Green Belt where possible. | No | 01687 | Enfield Road Watch |
| **SP PL11: Crews Hill** | Enfield Road Watch criticizes the proposal in PL11 for masterplanning through a Supplementary Planning Document (SPD). They argue that SPDs should provide detailed guidance on existing policies without introducing new policies or adding financial burdens, as per Planning Practice Guidance. Given the complex issues of deliverability and sustainability in the proposals, they contend that these matters | Comments noted. The Council is not creating new policy through the Supplementary Planning Document (SPD). Instead, the SPD will provide detailed guidance and implementation measures based on the policies already established in the Local Plan. This approach ensures that the SPD will offer practical, actionable steps to support the policy without overstepping its intended purpose. The policies in the Local Plan will serve as the necessary framework or 'hook' for | No | 01687 | Enfield Road Watch |

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| | exceed the detailed scope appropriate for an SPD. This raises concerns about the SPD's effectiveness in resolving the policy's problematic aspects. | the SPD, ensuring compliance with Planning Practice Guidance while facilitating effective implementation. | | | |
| **SP PL11: Crews Hill** | Enfield Road Watch's response to the Local Plan highlights concerns about the financial viability and the level of affordable housing. They argue that the requirement for 50% affordable housing on former Green Belt sites, as stated in Policy H2.2, is not supported by the Whole Plan Viability update, which suggests a feasible rate of 40% for Crews Hill. They also point out the high abnormal costs for infrastructure, including new bridges over the railway, and note that the 20% biodiversity net gain has not been tested in the viability assumptions. | Comments noted. The Whole Plan Viability Study (2023) conducted by HDH Planning and Development provides comprehensive evidence supporting the overall viability of the Local Plan, including higher affordable housing targets. The study acknowledges that while there may be site-specific challenges, strategic policies are based on robust financial modeling and market analysis. Policy H2.allows for a degree of flexibility based on site-specific viability assessments. The Council can adjust affordable housing requirements if justified by detailed viability evidence, ensuring that targets are ambitious yet achievable without compromising the overall development feasibility. While significant infrastructure investments, such as new bridges at Crews Hill, are acknowledged, these are essential for sustainable development and integrated transport solutions. The Local Plan includes mechanisms to secure necessary funding through developer contributions, grants, and strategic partnerships, ensuring these costs do not undermine overall viability. The 20% biodiversity net gain policy is supported by the Council's commitment to enhancing environmental sustainability and is factored into the broader strategic viability assessments. This policy aligns with national planning policies and ensures long-term ecological benefits that offset initial costs. The Local Plan's comprehensive approach, detailed in various supporting documents, ensures that development is sustainable, financially viable, and meets housing needs while preserving important environmental and community values. The Council asserts that the Local Plan's policies are grounded in thorough evidence, ensuring both viability and sustainability in meeting Enfield's future development needs. | No | 01687 | Enfield Road Watch |
| **SP PL11: Crews Hill** | Enfield Road Watch's response to the Local Plan expresses concerns about the risk of disjointed developments due to the numerous landowners at Crews Hill. They argue that adopting a high housing target based on Crews Hill's delivery could pressure the Council to approve applications that lack the comprehensive benefits of a masterplan. Consequently, they believe this aspect of the policy is ineffective and could lead to fragmented and suboptimal development outcomes. | Comments noted. The Council addresses Enfield Road Watch's concerns about the risk of disjointed developments at Crews Hill by ensuring a comprehensive and coordinated approach through masterplanning, as outlined in the "ELP Spatial Strategy and Overall Approach Topic Paper" and the "Crews Hill Topic Paper 2024." The Local Plan's policy framework and Supplementary Planning Document (SPD) provide the necessary guidance to manage development effectively, avoiding piecemeal projects. The Council has considered viability extensively, as supported by the "Enfield Housing Topic Paper 2024," ensuring that the proposed housing targets and infrastructure requirements are achievable and sustainable. The comprehensive evidence base underscores the Council's commitment to strategic, sustainable development that aligns with broader planning goals. | No | 01687 | Enfield Road Watch |
| **SP PL11: Crews Hill** | Enfield Road Watch's response to the Local Plan criticizes the urban design and layout proposals for Crews Hill. They argue that the plan for a 'consolidated and compact urban form' contradicts the figures presented, suggesting instead that development would result in urban sprawl into Enfield Chase's open countryside. They highlight concerns that the policy's wording may permit development beyond the railway line into areas like Crews Hill Golf Course and Kings Oak Plain, and call for clearer, unambiguous policies to prevent such sprawl. | Comments noted. It is essential to note that Figure 3.14 is an illustrative spatial framework plan, ensuring flexibility and context-based decision-making. This approach is detailed in the Crews Hill Topic Paper 2024, emphasizing the commitment to a sustainable and context-sensitive development strategy. | No | 01687 | Enfield Road Watch |
| **SP PL11: Crews Hill** | Enfield Road Watch (ERW) expresses concern about proposed developments impacting Sites of Importance for Nature Conservation (SINCs) at Crews Hill Golf Course and Glasgow Stud. ERW contends that Policy PL11 is ineffective, citing the LUC evidence that mitigation is insufficient for the unique acid grassland habitat at Crews Hill, advocating for avoidance strategies. Additionally, ERW highlights inconsistencies in Crews Hill policy regarding the Glasgow Stud SINC, noting that proposed development areas shown in Figure 3.14 encroach significantly into protected areas, contradicting policy intentions to protect and enhance these habitats. | Comments noted. The Council's Crews Hill Topic Paper 2024 emphasizes that the illustrations in Figure 3.14 are part of an indicative spatial framework and not definitive plans. Detailed master planning will follow, ensuring comprehensive environmental assessments and the incorporation of effective mitigation strategies to protect and enhance these habitats. Furthermore, the topic paper outlines specific measures for ecological protection, including the requirement for detailed ecological assessments and mitigation strategies. These steps are designed to minimize harm and ensure that development is sustainable and sensitive to the unique environmental characteristics of the area. The paper also highlights the potential for habitat enhancement and biodiversity net gain, ensuring that any development contributes positively to the ecological value of Crews Hill. The Council aims to balance development needs with environmental protection, | No | 01687 | Enfield Road Watch |

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| | | addressing the concerns raised by Enfield Road Watch through a clear and regulated planning process. | | | |
| **SP PL11: Crews Hill** | Enfield Road Watch's response highlights concerns over the effectiveness and clarity of Paragraph 17c in Policy PL11 regarding Areas of Special Character (ASCs). They argue that the policy's directive to "respond to" the surrounding landscape is vague and lacks definition, making it ineffective. Additionally, they note that the ASCs are not depicted on the policies map or detailed in the plan, weakening their role in preventing development sprawl beyond the designated areas, particularly in the context of SA11.2 and Kings Oak Plain. | Comments noted. Figure 3.14 in the Crews Hill document is an illustrative spatial framework plan, which helps in visualizing the spatial organization without being overly prescriptive. The plan provides an adaptable framework, allowing for detailed master planning that ensures any development respects and enhances the surrounding ASCs. The paper explicitly states that all developments must carefully consider and integrate with the surrounding landscape and ASCs. By providing clear guidelines within the planning framework, the policy ensures that the unique characteristics and historical significance of areas like Theobalds Estate South, Whitewebbs and Forty Hall, Clay Hill, and Turkey Brook are preserved. Furthermore, the Crews Hill Topic Paper addresses the integration of ecological and recreational spaces, ensuring that development will not only mitigate but also compensate for any potential impacts on the environment. This comprehensive approach balances growth with environmental stewardship and cultural heritage preservation, directly responding to the concerns raised by Enfield Road Watch. As detailed in the Crews Hill Topic Paper, the Council ensures that the ASCs will serve as strong, effective boundaries against uncontrolled development. This approach underscores the commitment to maintaining the character and integrity of Enfield's cherished landscapes while accommodating necessary growth. | No | 01687 | Enfield Road Watch |
| **SP PL11: Crews Hill** | Enfield Road Watch (ERW) argues that the proposed new Green Belt boundaries in the Local Plan, particularly around Crews Hill, are unjustified and ineffective compared to the firm boundary provided by the railway line. They contend that the Council's case for housing need does not support the large-scale release of Green Belt land, especially in areas like Kings Oak Plain. ERW highlights that the Enfield Characterisation Study emphasizes protecting the Green Belt in Crews Hill and restricting future development. They also reference the Green Belt study by LUC, which supports retaining the current boundaries. | Comments noted. The Council's Crews Hill Topic Paper (2024) addresses these concerns by illustrating that the new Green Belt boundaries, including creating open spaces along the brooks, are designed to reinforce defensible boundaries and enhance the ecological and recreational value of the area. The proposed boundaries and open spaces are intended to provide clear, long-term boundaries that support sustainable development while protecting and enhancing the character of the Green Belt. Figure 3.14 is an illustrative spatial framework plan, not prescriptive, allowing for detailed master planning that aligns with the policy objectives and ensures robust Green Belt protection. | No | 01687 | Enfield Road Watch |
| **SP PL11: Crews Hill** | Enfield Road Watch criticizes the proposals in PL11 paragraph 19a and b for new parks and open spaces, claiming they are ineffective due to the uncertainty of landowners' willingness to give up land with significant development potential once released from the Green Belt. They elaborate on these concerns in their detailed representations for SA11.5 and SA11.6. | Comment noted. The concerns raised by Enfield Road Watch regarding landowner willingness to allocate land for new parks and open spaces are addressed by the detailed strategies and policies within the Local Plan. The Crews Hill Topic Paper (2024) outlines comprehensive engagement with landowners and stakeholders to ensure alignment and cooperation in achieving planned open spaces. Additionally, the emerging Supplementary Planning Document (SPD) framework ensures that policy implementation is clear and actionable, providing the necessary guidance to deliver these spaces effectively. | No | 01687 | Enfield Road Watch |
| **SP PL11: Crews Hill** | Enfield Road Watch provides Knight Frank's Representation Statement - Rectory Farm - Prepared on behalf of the London Borough of Enfield 13 September 2021. The Rectory Farm Representation Statement, prepared by Knight Frank on behalf of the London Borough of Enfield, supports the inclusion of Rectory Farm as a site for future residential development within the emerging Local Plan. Key points include: 1) Site Description: Rectory Farm is located in the northern part of Enfield, adjacent to Crews Hill. Currently designated as Green Belt land, the site is largely undeveloped agricultural land with limited planning history. It is near Crews Hill's commercial area and residential clusters and has potential for residential development. 2) Development Proposal: The site is proposed for residential development, with the potential to deliver 39-65 homes, including affordable housing. Although surveys and masterplanning have not been completed, the site is seen as a viable addition to the Crews Hill placemaking area. 3) Green Belt Consideration: While the site is currently in the Green Belt, the report argues that it makes a limited contribution to Green Belt purposes. The development would meet local housing needs and contribute to the London housing target. The report recommends releasing the site from the Green Belt under the "exceptional circumstances" clause in the National Planning Policy Framework (NPPF). 4) | Comments noted. The justification for not including Rectory Farm as part of the wider Crews Hill site allocation in Enfield's Local Plan is set out in the in the Site Allocation Topic Paper for Regulation 19. The justification includes its strong contribution to the Green Belt, particularly in preventing urban sprawl and maintaining the countryside's character. The council's Green Belt Review identified its importance in separating settlements, and the site also faces sustainability and access challenges, being further from transport hubs and services compared to other sites. Crews Hill offers better connectivity and potential for placemaking aligned with the borough's growth strategy, while Rectory Farm's isolation could compromise these objectives. Additionally, environmental and planning constraints, such as impacts on landscape and biodiversity, contributed to the decision to prioritize less constrained sites for development. | No | 01687 | Enfield Road Watch |

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| | Sustainability: The site is considered sustainable due to its proximity to Crews Hill station and bus services. The development would promote sustainable patterns of growth, consistent with the NPPF's requirements. 1) Justification for Development: The report emphasizes the need to meet Enfield's housing targets and suggests that Rectory Farm is a suitable, available, and achievable site for development. It highlights the importance of balancing housing needs with affordability and ensuring that the right housing mix is delivered. 5) Exceptional Circumstances: Several factors are presented to justify the site's release from the Green Belt, including the urgent housing need, the site's suitability for development, and its potential to enhance landscaping and biodiversity in the area. In summary, Enfield Road Watch advocates for: 1) Allocating Rectory Farm for housing as part of the Crews Hill placemaking area in the Local Plan. 2) Releasing the site from the Green Belt, given its limited contribution to Green Belt purposes and its potential to help meet housing needs. Developing the site sustainably, ensuring it aligns with broader planning objectives for green and blue infrastructure while delivering much-needed housing. | | | | |
| **SP PL11: Crews Hill** | Enfield Road Watch provides an Assessment of Compliance with LTN1/20 Table 5.8, which focuses on Crews Hill. The group argues that the choice of Crews Hill as a development site is flawed due to the steep gradients on key routes connecting the area with surrounding locations like Enfield Town. The assessment, based on Local Transport Note 1/20 (LTN1/20), shows that the gradients exceed the acceptable limits for cycling infrastructure, making it difficult to achieve the sustainable travel goals set out in the London Plan, which aims for 80% of trips to be made by foot, cycle, or public transport by 2041. The analysis highlights that none of the direct routes from Crews Hill to key destinations can comply with the required standards for cycling infrastructure. Enfield Roadwatch recommends reconsidering the suitability of Crews Hill as a development site due to its non-compliant cycling routes. They emphasize that the gradients on the paths make it unlikely for the area to support sustainable travel, and thus, the development would not align with the London Plan's strategic transport and cycling policies. | Comments noted. The Crews Hill Topic Paper (2024) provides a justfified response, emphasizing that Crews Hill is identified as a key growth area in Enfield's Local Plan due to its strategic potential to deliver much-needed housing and green infrastructure improvements. The area benefits from proximity to existing rail links, offering opportunities for improved connectivity through sustainable transport upgrades. While Enfield Roadwatch highlights challenges with gradients for cycling infrastructure, the council plans to integrate a comprehensive network of walking and cycling routes, supported by earthworks and design modifications, to meet national and local policy goals. This holistic approach will ensure Crews Hill can support both housing growth and sustainable travel objectives in line with the London Plan's targets. | No | 01687 | Enfield Road Watch |
| **SP PL11: Crews Hill** | Residents have expressed concerns about Policy PL11, emphasizing that the development of 5,500 houses in Crews Hill will exacerbate traffic congestion, particularly during M25 issues, and overburden existing facilities like surgeries and schools. They stress the importance of preserving the last bit of greenbelt around Enfield for its environmental value and recreational benefits, warning that once the greenbelt is lost, it is gone forever. | Comments noted. The policy is justified. The ELP Spatial Strategy and Overall Approach Topic Paper prioritizes sustainable development that integrates infrastructure improvements to support new housing. The Exceptional Circumstances Topic Paper outlines that greenbelt development is considered only when absolutely necessary and with stringent environmental protections. The Crews Hill Topic Paper emphasizes measures to mitigate traffic impacts, enhance public services, and protect the ecological and recreational value of the greenbelt. | No | 01759 | Friends of Enfield Chase |
| **SP PL11: Crews Hill** | The Enfield Society's concerns about the Crews Hill development include the negative impact on the Green Belt, leading to loss of countryside views and harm to Enfield Chase. Increased traffic would adversely affect rural lanes, including conservation areas like Clay Hill. The development threatens ecological networks, particularly the unique acid grassland at Crews Hill Golf Course. Additionally, the plan risks substantial harm to significant heritage assets such as Owls Hall and The Paddocks due to inadequate consideration of their historical importance and landscape setting. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL11: Crews Hill** | The Enfield Society's concerns about the Crews Hill urban design and landscape focus on the negative impact of development west of the railway line on the high-sensitivity landscape of Enfield Chase. They argue that development would significantly harm the area's scenic quality, tranquillity, and sense of remoteness, jeopardizing the wooded backdrop that serves as a crucial landscape buffer. The society criticizes the proposed approach for not being genuinely landscape-led and | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize | No | 01794 | Enfield Society |

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| | highlights issues with boundary delineation, compact development, separation between settlements, and effective integration of heat networks. | environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | | | |
| **SP PL11: Crews Hill** | The Enfield Society's concerns about the Crews Hill development's accessibility and variety of open space include the omission of three Areas of Special Character (ASCs) from the policies map, questioning the large buffer area needed against the M25, and skepticism about the 'space of arrival' concept at Crews Hill station. They argue for a single Enfield Chase ASC, suggest the M25 buffer may be excessive, and doubt the feasibility of large-scale visitor attractions rivaling Lee Valley, given the potential for car-based arrivals and the area's historic landscape. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL11: Crews Hill** | The Enfield Society's concerns about movement and connectivity at Crews Hill highlight the area's limitations in sustainable transport. They note that most trips will be car-based due to the infrequent bus service (456) and challenging topography that discourages walking and cycling. They also question the scale and effectiveness of the proposed Local Centre to retain trips within a walkable area. The Society doubts the feasibility of achieving the London Plan's target of 80% sustainable travel for the development. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL11: Crews Hill** | The Enfield Society questions the justification for allocating £5.483 million of compensatory funding from Green Belt developments to renovate the disused buildings at Rectory Farm. They argue that this expenditure is not necessary and could attract motorized visitors, thereby spoiling the area's quiet, rural nature. The Society believes that the harm to the character and historic landscapes of the borough outweighs the benefits of this project. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP PL11: Crews Hill** | The Barnet Society sees merit in focusing new development around Crews Hill Station to create a sustainable settlement. However, they express concerns about the impact on the area's horticultural and food-producing industries. The Society is worried about the future of Crews Hill's existing businesses due to rising land values and traffic congestion. They highlight a lack of specific proposals in the Plan for necessary rail, road, and other transport improvements in Crews Hill. The Society suggests the Plan should include explicit commitments to protect the horticultural and food-producing businesses in Crews Hill. They recommend that the Plan include detailed proposals for improving transport infrastructure in Crews Hill to support the sustainable development goals. Their recommendations aim to ensure that development in Crews Hill is genuinely sustainable, preserving local industries while enhancing infrastructure. | Comments noted. The Plan emphasizes the creation of sustainable settlements by concentrating development around transport hubs like Crews Hill. The strategy aligns with national policies, ensuring that growth in this area is compact and resource-efficient. The Integrated Impact Assessment (IIA) highlights the importance of balancing development with the preservation of local industries. The Plan supports retaining and enhancing horticultural and food-producing businesses while promoting economic diversification. The Spatial Strategy and IIA: Both documents underline the necessity of improving transport infrastructure to support sustainable growth. The Plan commits to enhancing road and rail connections, specifically addressing the needs of areas like Crews Hill.<br>The Enfield Local Plan already aligns with The Barnet Society's concerns by promoting sustainable development, protecting local industries, and planning for necessary transport improvements. The Plan's strategies are designed to ensure that growth in Crews Hill is balanced, preserving the area's character while addressing infrastructure needs. | No | 01817 | The Barnet Society |

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| **SP PL11: Crews Hill** | Lea Valley Growers Association object to the loss of popular garden centers and supporting businesses in Crews Hill for housing development. They advocate enhancing horticultural activities to make it a hub for food and plant production. They argue that Enfield's housing targets can be met on brownfield sites, as evidenced in the "Space to Build" report, which identifies locations for 37,000 homes. They emphasize the Green Belt's value for environmental, ecological, economic, and public health reasons, urging the Council to protect it in line with the London Plan and NPPF. | Comments noted. The Council's strategy is justified. The plan's target of 1,246 net new homes a year us considered the minimum required. The plan sets out general presumption of brownfield first approach to delivering sustainable growth by focusing development within growth areas, district town centres and around transport hubs. Plan is supported by the Infrastructure Delivery Plan (IDP) which identifies Enfield's infrastructure needs comprehensively. The Enfield Exceptional Circumstances Topic Paper outlines the justification for releasing Green Belt land to meet Enfield's housing and employment needs. It evaluates the balance between development requirements and Green Belt protection, ensuring alignment with national and regional policies like the NPPF and London Plan. The paper details the specific circumstances under which Green Belt boundaries may be adjusted, emphasizing the necessity of sustainable development while maintaining the Green Belt's primary functions, such as preventing urban sprawl and preserving open space. | No | 01910 | Lea Valley Growers Association |
| **SP PL11: Crews Hill** | Federation of Enfield Residents & Allied Association (FERAA) outlines objections to specific policies (PL10 and PL11) in the Local Plan. For PL11, FERAA consider the plan for a large commuter township on Crews Hill is not legally compliant or sound, particularly because of its proximity to the M25 without appropriate access and infrastructure. The proposed density and the overall plan for Crews Hill contradict the quality of living aims of the Local Plan.<br>Green Belt Concerns: The development would result in the loss of Green Belt land, which is presented as inconsequential in the Plan, a position with which the representation strongly disagrees. The area is served by inadequate road infrastructure, particularly the low-capacity country lanes and the congested M25/J25 junction, which would not support the proposed development. Building within the pollution shadow of the M25 would lower living standards. The local rail connection is inadequate for the commuting needs of new residents, with no significant improvements expected. The development would replace thriving local horticultural businesses with housing, removing local employment and contradicting the Plan's ambitions to generate employment. The dispersal of horticulture from the site is seen as a major error, as the area is a center of excellence in horticulture, providing specialized employment and services. FERAA consider the policy should be removed from the Local Plan. | Comments noted. The Enfield Local Plan is both sound and legally compliant, developed based on up-to-date evidence contained in the council's planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. The A110 development aligns with the Enfield Local Plan's overall spatial strategy, which aims to accommodate necessary housing growth while maintaining a balance with environmental and infrastructural considerations. The plan acknowledges the potential impacts on Trent Country Park but includes comprehensive mitigation strategies to protect and enhance the park's ecological value and recreational use. This approach is in line with the spatial strategy's emphasis on sustainable growth and protecting green spaces. The plan includes provisions for upgrading the A110 and associated transport links to support increased traffic and mitigate congestion. The intention is to improve road capacity and enhance public transport connections, addressing concerns about the current limitations of the A110. These improvements are designed to integrate with the broader transport strategy, which includes enhancements to local bus services and potential future rail improvements. The inclusion of the site and site allocations in the Local Plan are based on a rigorous evaluation of potential benefits and challenges. The developer, Comer Homes and others, is required to adhere to strict quality standards and community engagement processes, ensuring that the development meets high standards and addresses local needs. The plan aims to deliver a balanced mix of housing types, including family homes, and incorporates community amenities to support a vibrant, sustainable neighbourhood. In summary, the Enfield Local Plan's policies are designed to address the Federation's concerns by incorporating robust mitigation measures, infrastructure enhancements, and community-focused strategies to balance housing needs with environmental protection and quality of life considerations. | No | 03273 | Federation of Enfield Residents & Allied Associations |
| **SP PL11: Crews Hill** | The Federation of Enfield Residents & Allied Associations, raised several significant concerns about the Enfield Local Plan, particularly regarding Policies PL10 and PL11 - for Policy PL11: They contend that the Crews Hill development plan, which proposes several thousand residential units, conflicts with the NPPF's quality-of-life objectives. The plan is criticized for not addressing the site's Green Belt status and the potential loss of valued horticultural enterprises and leisure facilities. The site's road access and infrastructure are deemed insufficient for the proposed scale of development, exacerbating existing congestion issues and pollution concerns. They argue that the plan fails to address the quality of living | The Enfield Local Plan is both sound and legally compliant, developed based on up-to-date evidence contained in the council's planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. The A110 development aligns with the Enfield Local Plan's overall spatial strategy, which aims to accommodate necessary housing growth while maintaining a balance with environmental and infrastructural considerations. The plan acknowledges the potential impacts on Trent Country Park but includes comprehensive mitigation strategies to protect and enhance the park's ecological value and recreational use. | No | 03273 | Federation of Enfield Residents & Allied Associations |

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| | issues and does not provide a feasible solution for local employment or transportation, which would result in a commuter-centric development without adequate local amenities. In both cases, the Federation asserts that the plans should be revised or deleted to ensure they meet legal and planning soundness requirements. | This approach is in line with the spatial strategy's emphasis on sustainable growth and protecting green spaces. The plan includes provisions for upgrading the A110 and associated transport links to support increased traffic and mitigate congestion. The intention is to improve road capacity and enhance public transport connections, addressing concerns about the current limitations of the A110. These improvements are designed to integrate with the broader transport strategy, which includes enhancements to local bus services and potential future rail improvements. The inclusion of the site and site allocations in the Local Plan are based on a rigorous evaluation of potential benefits and challenges. The developer, Comer Homes and others, is required to adhere to strict quality standards and community engagement processes, ensuring that the development meets high standards and addresses local needs. The plan aims to deliver a balanced mix of housing types, including family homes, and incorporates community amenities to support a vibrant, sustainable neighbourhood. In summary, the Enfield Local Plan's policies are designed to address the Federation's concerns by incorporating robust mitigation measures, infrastructure enhancements, and community-focused strategies to balance housing needs with environmental protection and quality of life considerations. | | | |
| **SP PL11: Crews Hill** | Edmonton Hundred Historical Society (EHHS) object to PL11. Visitors to this area travel from a wide area some from as far as Watford to visit the numerous garden centres along with other businesses in the area. People value all the local businesses which are very popular. A large development, such as that in the Enfield Local Plan will put pressure on local roads as it<br>is likely to be dominated by cars with people having to travel to employment, shops, schools etc. Due to there being only a couple of main roads into and through the area this pressure will extend to local conservation areas at Clay Hill and Forty Hall. This area is used by walkers and horse riders who value<br>the open spaces as it is. The plans for so many new properties in this area stretching as far as the M25 will have an impact on the views across the historic landscape of Enfield Chase especially when using the Ridgeway out to Potters Bar. | Comments noted. The Council acknowledges residents' concerns about Policy DM DE6 and the proposed tall buildings at Enfield Chase Station, Palace Gardens/Exchange, Tesco's/Sorting Office, and the Civic Centre, which they fear will impact the historical market square, listed buildings like St Andrews Church, and the character of the Enfield Town Conservation Area. The council's spatial strategy supports higher-density developments in well-connected areas to optimize land use and promote sustainability, as outlined in their overall approach and site allocation topic papers. Evidence-based guidelines ensure that new developments are designed to blend with and enhance the existing urban fabric while protecting historically significant areas. The council directs taller developments away from sensitive areas, suggesting previously industrial sites like Meridian Water as more suitable alternatives to minimize negative impacts on heritage sites and conservation areas. To address these concerns, the council commits to stringent design guidelines, preserving sightlines, incorporating green spaces, and engaging with the community to balance development needs with residents' preferences. | No | 04036 | Edmonton Hundred Historical Society (EHHS) |
| **SP PL11: Crews Hill** | The Bush Hill Park Residents' Association objects to Policy PL11 on the grounds of legal compliance, citing the following concerns: the proposals would cause significant harm to the historic Enfield Chase, negatively impacting views from the Ridgeway and obstructing views of the historic landscape along a public right-of-way between Cattlegate Road and Strayfield Road. Additionally, they highlight the scale of development, which would likely increase car traffic on narrow country roads and note that ongoing land disputes prevent effective public transport connections. Lastly, they express concern over the potential closure of numerous small and medium businesses, resulting in significant job losses. They suggest the policy should be deleted from the plan. | Policy PL11 is justified by Enfield's need to meet housing targets, promote sustainable growth, and foster economic regeneration, as outlined in the Crews Hill Topic Paper (2024) and ELP Spatial Strategy (2024). Crews Hill has been identified as a key area for development due to its capacity for new housing, improved infrastructure, and economic opportunities, while still balancing environmental and heritage considerations. The policy aims to enhance connectivity, including better public transport and infrastructure improvements, while respecting the historic character of Enfield Chase. Although some businesses may be impacted, the policy seeks to support long-term economic growth and community revitalization. | No | 04218 | Bush Hill Park Residents Association |
| **SP PL11: Crews Hill** | FLDRA acknowledges the need for more housing, especially affordable and social housing, in the borough. However, the justification for building on protected Green Belt land is insufficiently demonstrated. In 2019, the Enfield Society and CPRE identified brownfield sites suitable for over 37,000 homes, surpassing the Local Plan's stated need of at least 33,280 homes. The proposed loss of high-quality Green Belt land contradicts the goal of making the Borough greener and would also result in the loss of local garden center businesses and associated employment. | Comments noted. The proposed development at Crews Hill is part of a strategic approach to meet Enfield's housing needs while ensuring that the character and environmental quality of the area are preserved. The Crews Hill Topic Paper highlights that the development will incorporate significant green spaces and biodiversity enhancements, ensuring the protection of key environmental features. The plan also addresses infrastructure needs, including improvements to transport links and community facilities, to support the increased population. By carefully integrating new development with existing natural and historical assets, the proposal seeks to balance growth with the preservation of Crews Hill's unique character, thereby supporting both current and future community needs. This approach is aligned with sustainable development principles, ensuring that the area continues to thrive while meeting the borough's housing demands. The strategy includes measures to enhance public transport, create sustainable | No | 06825 | Fox Lane District Residents' Association |

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| | | communities, and ensure infrastructure improvements to handle increased traffic. While the response highlights challenges with gradients for cycling infrastructure, the council plans to integrate a comprehensive network of walking and cycling routes, supported by earthworks and design modifications, to meet national and local policy goals. The Placemaking Framework recognises that the prominence of the existing museum on Whitewebbs Road is enhanced through expanding a new public park around it. The museum will sit at an important junction between a new green link running from the station to Cuffley Park. The new development aims to bring job opportunities to the area through new commercial spaces and improved transport links, mitigating job losses from displaced garden centres and businesses. | | | |
| **SP PL11: Crews Hill** | The Enfield Conservative Group has raised significant objections to the proposed developments in the Crews Hill area as outlined in the Enfield Local Plan. They argue that these proposals do not meet the "exceptional circumstances" required for Green Belt release according to the National Planning Policy Framework (NPPF). The group is particularly concerned about the negative impact on the natural environment and biodiversity, the urbanization of rural settings, and the loss of recreational spaces like the Crews Hill Golf Club. They also highlight the potential harm to the Sites of Importance for Nature Conservation (SINC) in the area and express concerns about the strain on the existing transportation infrastructure, noting that the current road network and public transport services are inadequate to support the proposed developments, which would likely lead to increased car dependency. In response to these issues, the Conservative Group recommends deleting the proposed developments at Crews Hill, Chase Park, and Hadley Wood from Policy SS1, along with related site allocations and policies. They suggest reinstating more restrictive policies on tall buildings and revising Policy H4 to focus solely on brownfield sites, aligning it with the guidelines set out in the London Plan. Additionally, they advocate for clearer and more precise policy language to ensure consistent application and limit the discretionary power of planning officers. These recommendations aim to protect the Green Belt, preserve the rural character of the area, and ensure that future developments are sustainable and compliant with both local and national planning policies. | The Council acknowledges the concerns regarding Green Belt development, but the proposals in the Draft Plan are supported by a robust evidence base, including a comprehensive Green Belt Review. This review identifies areas where "exceptional circumstances" exist, justifying the release of Green Belt land to meet the borough's critical housing needs. The review considered the limited availability of brownfield sites and the need to address housing pressures in a sustainable manner. The proposed developments in Crews Hill are part of a strategic approach to distribute growth across the borough while minimizing the impact on the most sensitive areas of the Green Belt. Moreover, the Draft Plan includes detailed provisions for infrastructure improvements to support these developments, particularly in areas like Crews Hill where current public transport and road networks may be inadequate. The Plan outlines strategies to enhance transport links and reduce car dependency, aligning with both local and regional planning objectives. These measures ensure that any development in Green Belt areas will be accompanied by necessary infrastructure upgrades, making the growth sustainable and reducing potential negative impacts on the local environment and communities. | No | 01670 | Cllr Skelton |
| **SP PL11: Crews Hill** | The Councillor, on behalf of the Edmonton and Winchmore Hill Conservative Association, objects to the proposal to build 5,500 homes on the Crews Hill Green Belt site as outlined in PL11, citing multiple concerns. The existing Crews Hill station, part of the Hertford Loop line, already operates at capacity during peak hours, and the increased number of commuters would exacerbate congestion, impacting stations further down the line, such as Enfield Chase and Palmers Green. Additional concerns include the detrimental effects on local nature conservation sites, loss of scenic views from the Ridgeway, the displacement of garden centers, and the disruption to the rural setting of Whitewebbs Transport Museum. These issues, they argue, render the proposal unsound and warrant its removal from the plan. | Comments noted. The policy aligns with Enfield's strategic vision for sustainable growth. The Crews Hill Topic Paper emphasizes that the plan will integrate significant infrastructure improvements, including enhanced public transport options and local amenities to mitigate traffic and service congestion. The development will also focus on preserving green spaces and enhancing biodiversity. The plan includes rigorous environmental assessments to protect Sites of Importance for Nature Conservation and aims to balance housing needs with the conservation of the area's rural character and heritage sites. For detailed planning, refer to the Crews Hill Topic Paper. | No | 01784 | Edmonton and Winchmore Hill Conservative Association |
| **Chapter 4: Climate Resilience** | | | | | |
| **SP SE1: Responding to the climate emergency** | The NHS London Healthy Urban Development Unit (HUDU) supports Chapter 4 and its aims to respond to the climate emergency. The NHS is committed to reaching 'net zero' carbon by 2040 and achieving an 80% reduction in emissions by 2028-2032. The report "Delivering a Net Zero National Health Service" (January 2020) outlines interventions to help decarbonize the NHS, including reducing emissions from the NHS estate, promoting sustainable healthcare models, encouraging less polluting travel options, and preventing ill health to reduce hospital admissions. HUDU also recommends policies aiming to retrofit buildings for climate resilience where possible. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |

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| **SP SE1: Responding to the climate emergency** | Hertsmere supports Enfield's aspirational vision and strategic objectives, especially the goal to tackle the climate emergency. Suggestion to extend net-zero ambitions to all developments, not just major ones. | The Local Plan is subject to whole plan viability. Planning applications will be assessed on a case by case basis on their own merits. Further engagement and statement of common ground to consider willingness to engage with Enfield Council under Duty to Cooperate arrangements for both Local Plans. | No | 01924 | Hertsmere Borough Council |
| **SP SE1: Responding to the climate emergency** | The Environment Agency supports Policy SE1, particularly its reference to addressing 'all sources of flooding' in point 7. The EA suggests enhancing point 12 by including Natural Flood Management (NFM) alongside tree planting, as NFM can increase flood resilience while also supporting biodiversity. | The council welcomes the support of Policy SE1 and the EA's suggestion to include Natural Flood Management (NFM) alongside tree planting in point 12 of Policy SE1. The Council acknowledges the benefits of NFM in increasing flood resilience and supporting biodiversity and will consider incorporating this approach in the final policy wording to strengthen our sustainable flood management strategies. We are committed to working collaboratively with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | No | 01926 | Environment Agency |
| **SP SE1: Responding to the climate emergency** | McCarthy and Stone's response highlights concerns with the draft Local Plan's climate resilience and change policies, noting that their repetitive and lengthy nature leads to confusion. They argue that, to align with Paragraph 16(d) of the NPPF, which requires plans to be clearly written and unambiguous, the section should be re-written to combine sections and clarify decision-making for development proposals. While they commend the Council's commitment to net zero carbon emissions, they caution against imposing mandatory standards that exceed government targets, suggesting that requirements should be aligned with the Government's stepped targets and proposed changes to building regulations. They reference a Ministerial Statement from December 2023, which advises against local standards exceeding national regulations due to the additional costs and complexity they introduce. The statement asserts that local energy efficiency standards beyond national regulations should be rejected unless they have a well-reasoned, robustly costed rationale. | The feedback on the climate resilience and change policies in the draft Local Plan is noted. The Council appreciate their recognition of Enfield's commitment to achieving net zero carbon emissions and their constructive suggestions for improving the clarity and consistency of the plan's policies. The Council acknowledge the need to ensure the plan's policies are clearly written and unambiguous, as required by Paragraph 16(d) of the NPPF. The council will review the relevant sections to combine and streamline the policies, ensuring it is clear how decision-makers should react to development proposals. Regarding the alignment with national targets, the council note their concerns about the potential for local standards to exceed government regulations and the associated costs. The council will carefully consider the Ministerial Statement from December 2023 and ensure that any local energy efficiency standards we propose are well-reasoned, robustly costed, and consistent with national policy. The plan's approach is justified by the evidence provided in the Enfield Viability Update (2023) and the ELP Spatial Strategy and Overall Approach Topic Paper (2024). These documents support the need for ambitious local policies to meet Enfield's strategic objectives while ensuring that development remains viable. Specifically, the Viability Update demonstrates that the plan's policies, including those for climate resilience, have been thoroughly assessed for their economic impact, ensuring they are realistic and achievable. The ELP Spatial Strategy further reinforces the necessity of these policies in achieving sustainable development that aligns with both local and national priorities. The council look forward to continuing to work together to create a Local Plan that effectively addresses climate resilience while being clear, practical, and aligned with national objectives. | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |
| **SP SE1: Responding to the climate emergency** | Vistry Group supports the emphasis on sustainability and carbon reduction in the draft local plan, noting alignment with the London Plan (2021). However, they express concern that some policies exceed GLA requirements, potentially straining developments. They suggest introducing flexibility in these policies to consider site-specific circumstances, viability, and conflicting policy requirements. This would help balance sustainability targets with other development objectives. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **SP SE1: Responding to the climate emergency** | Blackrock UK Property Fund objects to Draft Policy SE1, which requires new developments to have no incoming gas supply. They argue that for some employment developments, gas connections are necessary to meet high heating requirements that alternative methods cannot provide. They propose an amendment to include flexibility for gas connections in specific circumstances to meet operational needs of employment occupiers. Proposed Changes: The Council will work with partners to: *4. prioritise heat decarbonisation, with no new gas connections (unless required in particular circumstances such as to meet employment occupiers' operational requirements), ensuring all heating and hot water in proposed developments are provided through low carbon sources.* | The Council appreciates Blackrock UK Property Fund's feedback on Draft Policy SE1 and understands the concerns raised regarding the necessity for gas connections in specific employment developments where high levels of heating are required. However, the Council's approach is aligned with our commitment to heat decarbonisation and reducing carbon emissions, as outlined in the Enfield Local Plan. The requirement for no new gas connections is part of Enfield's broader strategy to transition towards low-carbon heating solutions and meet our sustainability targets. While the Council recognizes the operational needs of certain employment occupiers, the emphasis remains on exploring and prioritizing low-carbon alternatives wherever feasible. The Council is open to further discussions to explore how the policy can balance operational requirements with Enfield's sustainability goals. The Council proposes entering into a Statement of | No | 01952 | Blackrock UK Property Fund |

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| | | Common Ground to collaboratively address these concerns and find mutually agreeable solutions. | | | |
| **SP SE1: Responding to the climate emergency** | NHS Property Services (NHSPS) fully supports Draft Policy SE1's promotion of carbon-neutral development, aligning with the NHS's goal of achieving net zero carbon in all new projects. They suggest that NHS properties could benefit from carbon offset funds collected when on-site carbon mitigation cannot be met, aiding the NHS in becoming the world's first net zero healthcare provider. NHSPS considers the current wording of Draft Policy SE1 to be sound. | Support noted. | No | 01985 | NHS Property Services |
| **SP SE1: Responding to the climate emergency** | CPRE London supports the Council's commitments to address climate change, reduce air pollution, manage flood risk, and promote sustainable infrastructure. They advocate for strong policies that ensure new developments manage rainwater on-site, incorporating features like ponds, wetlands, and grey water recycling. They also recommend retrofitting existing buildings with SUDS planters, water butts, dual aspect designs for natural ventilation, appropriate insulation, and shared/sustainable energy systems. | Support noted. The Council acknowledges and supports CPRE London's emphasis on addressing climate change, reducing air pollution, managing flood risk, and promoting sustainable infrastructure. The Enfield Local Plan and the Blue and Green Strategy integrate policies to ensure new developments manage rainwater on-site through sustainable urban drainage systems (SUDS), ponds, wetlands, and grey water recycling. The Council also advocate for retrofitting existing buildings with SUDS planters, water butts, dual aspect designs for natural ventilation, appropriate insulation, and shared/sustainable energy systems. This holistic approach ensures resilient and sustainable urban development. | No | 01726 | CPRE London |
| **SP SE1: Responding to the climate emergency** | Joanne McCartney, AM for Enfield and Haringey, acknowledged Enfield's commitment to becoming a carbon-neutral borough by 2040 and its efforts to protect biodiversity and enhance access to parks and green spaces. | Support noted. | No | 01896 | Joanne McCartney AM London Assembly Member for Enfield and Haringey |
| **DM SE2: Sustainable design and construction** | Thames Water emphasizes the importance of including comprehensive water efficiency measures in Policy SE2 of the Enfield Local Plan. They highlight that the Thames Water region is "seriously water stressed" and advocate for water conservation to manage the impact of population growth and climate change. They support the NPPG target of 110 litres per head per day for water consumption and propose that all new residential developments should meet this standard through the 'Fittings Approach' specified in Building Regulations. Thames Water also promotes water efficiency campaigns to encourage local water conservation efforts. Proposed Policy Text: "Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met." | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with Thames Water to support responsible development and maintain essential services. | Yes | 01681 | Thames Water |
| **DM SE2: Sustainable design and construction** | Savills, on behalf of Asda, generally supports the remainder of the Enfield Local Plan but recommends ensuring flexibility within detailed policies to apply them appropriately. They note that several policies, such as SE2 (Sustainable Design and Construction Statement), SE9 (use of SuDS), DE3 (creating accessible spaces), DE7 (improving public realm quality), and DE11 (landscaping schemes), apply to "all development." However, Savills argues that it may be impractical or disproportionate for minor developments to meet these requirements. They suggest amending the policy wording to include "where applicable to the type of development and appropriate to do so" to accommodate the varying nature of development proposals. | The council welcomes Asda's general support of the Enfield Local Plan. The Council appreciate their feedback on ensuring flexibility within detailed policies to apply them appropriately. The Council will consider amending the policy wording to include "where applicable to the type of development and appropriate to do so," particularly for policies SE2, SE9, DE3, DE7, and DE11. This adjustment aims to accommodate the varying nature of development proposals while maintaining the council's commitment to sustainable design and quality public spaces. This approach ensures that policies are practical and proportionate, aligning with Enfield's sustainable development goals as outlined in the Enfield Viability Update. | Yes | 01732 | Asda Stores Ltd |
| **DM SE2: Sustainable design and construction** | McCarthy and Stone's response highlights concerns with the draft Local Plan's climate resilience and change policies, noting that their repetitive and lengthy nature leads to confusion. They argue that, to align with Paragraph 16(d) of the NPPF, which requires plans to be clearly written and unambiguous, the section should be re-written to combine sections and clarify decision-making for | The feedback on the climate resilience and change policies in the draft Local Plan is noted. The Council appreciate their recognition of Enfield's commitment to achieving net zero carbon emissions and their constructive suggestions for improving the clarity and consistency of the plan's policies. The Council acknowledge the need to ensure the plan's policies are clearly written and | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |

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| | development proposals. While they commend the Council's commitment to net zero carbon emissions, they caution against imposing mandatory standards that exceed government targets, suggesting that requirements should be aligned with the Government's stepped targets and proposed changes to building regulations. They reference a Ministerial Statement from December 2023, which advises against local standards exceeding national regulations due to the additional costs and complexity they introduce. The statement asserts that local energy efficiency standards beyond national regulations should be rejected unless they have a well-reasoned, robustly costed rationale. | unambiguous, as required by Paragraph 16(d) of the NPPF. The council will review the relevant sections to combine and streamline the policies, ensuring it is clear how decision-makers should react to development proposals. Regarding the alignment with national targets, the council note their concerns about the potential for local standards to exceed government regulations and the associated costs. The council will carefully consider the Ministerial Statement from December 2023 and ensure that any local energy efficiency standards we propose are well-reasoned, robustly costed, and consistent with national policy.<br><br>The plan's approach is justified by the evidence provided in the Enfield Viability Update (2023) and the ELP Spatial Strategy and Overall Approach Topic Paper (2024). These documents support the need for ambitious local policies to meet Enfield's strategic objectives while ensuring that development remains viable. Specifically, the Viability Update demonstrates that the plan's policies, including those for climate resilience, have been thoroughly assessed for their economic impact, ensuring they are realistic and achievable. The ELP Spatial Strategy further reinforces the necessity of these policies in achieving sustainable development that aligns with both local and national priorities.<br><br>The council look forward to continuing to work together to create a Local Plan that effectively addresses climate resilience while being clear, practical, and aligned with national objectives. | | | |
| **DM SE2: Sustainable design and construction** | CCLA Investment Management supports the general principles of Policy SE2 but argues against additional requirements beyond those in the London Plan, as they may render projects unviable. They emphasize balancing sustainable outcomes with scheme viability, in line with NPPF paragraph 35(b). While supporting the target for non-residential schemes over 1,000sqm to achieve BREEAM 'Outstanding,' they suggest this should be an aspiration due to the impracticality for energy-intensive developments. They propose flexibility in the policy to account for financial and operational viability, ensuring effectiveness as per NPPF paragraph 35(c). | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **DM SE2: Sustainable design and construction** | Vistry Group objects to point 2 of draft Policy SE2, which requires major residential developments to achieve a minimum 4* Home Quality Mark. They argue that this requirement exceeds national policy and building regulations, creating a conflict. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **DM SE2: Sustainable design and construction** | Prologis supports the draft policy's aim for sustainability but opposes the requirement for non-residential developments over 1,000 sqm to achieve BREEAM outstanding, suggesting it is too onerous. They argue that this high standard should be reserved for the top 1% of buildings due to significant credit requirements. Prologis believes this policy fails the tests of soundness, being neither justified, effective, nor consistent with national policy, and could hinder key developments. They recommend amending the policy to encourage but not mandate achieving BREEAM outstanding, with excellent as the minimum requirement. | It is considered that the need for non-residential developments to achieve a BREEAM standard of "Outstanding" is justified and that it is not appropriate to reduce the standard. London Plan policy SE2 requires that major development should be net zero-carbon towards the aim of London becoming a zero-carbon city. At a local level it is anticipated that climate change will have a significant impact on Enfield without the implementation of mitigation and adaptation measures, and obligations such as the requirement for non residential buildings, to achieve BREEAM standard of "Excellent" is necessary to ensure that net zero-carbon can be achieved. In addition it should be used in a positive way to highlight the issue of sustainable development and resource management. Furthermore, this is considered to be a short-term outlook rather than concerning the whole life-cycle of the property including on-going running costs, or potential future improvements which may be required to bring the property up to even higher environmental standards (if introduced in future). The council also considers that particularly if it is considered at the outset of a project, such projects can be achieved without adding substantial additional cost. If costs are prohibitive then the | No | 01905 | Prologis for Ravenside Retail Park |

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| | | Council may agree a lower standard if specific priority measures can be achieved taking account of the site's characteristics. | | | |
| **DM SE2: Sustainable design and construction** | Blackrock UK Property Fund objects to the requirement for all planning applications, including smaller ones like changes of use, to be accompanied by a Sustainable Design and Construction Assessment, deeming it unreasonable and burdensome. They argue this is inconsistent with Section 62 (4A) of the 1990 Town and Country Planning Act. They propose that only major developments, which are likely to have more significant sustainability impacts, should be required to submit such assessments. They suggest the policy be amended to require Sustainable Design and Construction Assessments only for major developments, ensuring the statement is proportionate to the scale and nature of the development. | The Council acknowledges Blackrock UK Property Fund's concerns regarding the requirement for Sustainable Design and Construction Assessments. The aim of Draft Policy SE1 is to ensure that sustainability is integrated into all developments within the borough to achieve our environmental goals. However, we understand the need for a balanced approach that does not place unnecessary burdens on smaller applications. The Council will work with all stakeholders, including Blackrock UK Property Fund, to refine the policy details through a Statement of Common Ground, ensuring the Local Plan effectively supports high-quality, sustainable development across the borough. | No | 01952 | Blackrock UK Property Fund |
| **DM SE2: Sustainable design and construction** | Fairview note their agreement with the policy in principle they consider the policy to overly onerous and above and beyond national standards for house building. They highlight the Written Ministerial statement on this matter and suggest that the policy is amended to require development to achieve levels of sustainability set out in national legislation and encourage any targets that sit over and above this. | Comments noted. The Council is committed to working collaboratively with stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01746 | Fairview New Homes |
| **DM SE2: Sustainable design and construction** | The Home Builders Federation (HBF) argues that the policy approach is unsound because it conflicts with national policy. Part 2 of the policy specifies that major developments should achieve a Home Quality Mark of 4.5, which diverges from current building regulations. The Government opposes local authorities setting their own energy efficiency standards, as stated by the Housing Minister on December 13, 2023. The Government's stance is that multiple local standards increase costs and complexity for building new homes. The draft policy does not comply with the Government's requirement for additional standards to be a percentage uplift of the Target Emissions Rate (TER) using a specified Standard Assessment Procedure (SAP). HBF also notes that, given viability challenges, particularly in the east of the Borough, the Council is unjustified in departing from the building regulations. | The policy was drafted prior to the written Minister Statement, and this matter will be considered further in light of any further policy updates under a new Housing Minister. | Yes | 01851 | Home Builders Federation |
| **DM SE3: Whole-life carbon and circular economy** | McCarthy and Stone's response highlights concerns with the draft Local Plan's climate resilience and change policies, noting that their repetitive and lengthy nature leads to confusion. They argue that, to align with Paragraph 16(d) of the NPPF, which requires plans to be clearly written and unambiguous, the section should be re-written to combine sections and clarify decision-making for development proposals. While they commend the Council's commitment to net zero carbon emissions, they caution against imposing mandatory standards that exceed government targets, suggesting that requirements should be aligned with the Government's stepped targets and proposed changes to building regulations. They reference a Ministerial Statement from December 2023, which advises against local standards exceeding national regulations due to the additional costs and complexity they introduce. The statement asserts that local energy efficiency standards beyond national regulations should be rejected unless they have a well-reasoned, robustly costed rationale. | The feedback on the climate resilience and change policies in the draft Local Plan is noted. The Council appreciate their recognition of Enfield's commitment to achieving net zero carbon emissions and their constructive suggestions for improving the clarity and consistency of the plan's policies. The Council acknowledge the need to ensure the plan's policies are clearly written and unambiguous, as required by Paragraph 16(d) of the NPPF. The council will review the relevant sections to combine and streamline the policies, ensuring it is clear how decision-makers should react to development proposals. Regarding the alignment with national targets, the council note their concerns about the potential for local standards to exceed government regulations and the associated costs. The council will carefully consider the Ministerial Statement from December 2023 and ensure that any local energy efficiency standards we propose are well-reasoned, robustly costed, and consistent with national policy.<br><br>The plan's approach is justified by the evidence provided in the Enfield Viability Update (2023) and the ELP Spatial Strategy and Overall Approach Topic Paper (2024). These documents support the need for ambitious local policies to meet Enfield's strategic objectives while ensuring that development remains viable. Specifically, the Viability Update demonstrates that the plan's policies, including those for climate resilience, have been thoroughly assessed for their economic impact, ensuring they are realistic and achievable. The ELP Spatial Strategy further reinforces the necessity of these policies in achieving sustainable development that aligns with both local and national priorities.<br><br>The council look forward to continuing to work together to create a Local Plan that effectively addresses climate resilience while being clear, practical, and aligned with national objectives. | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |

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| **DM SE3: Whole-life carbon and circular economy** | CCLA Investment Management acknowledges the design requirements to achieve pre-2030 targets but raises concerns about the higher targets' viability and functionality, which remain largely untested and are not reflected in the local plan's viability assessment. They highlight the unique carbon considerations for multi-storey industrial buildings due to their specific structural needs. CCLA suggests mandating carbon optioneering for major developments requiring demolition to assess optimal approaches, noting that this could impact project viability. They consider the policy unjustified under NPPF paragraph 35(b). | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **DM SE3: Whole-life carbon and circular economy** | Vistry Group seeks more flexibility in draft policy SE3, specifically in table 4.1 regarding upfront carbon requirements. They note that the current targets before 2023 align with the GLA's aspirational goals, but the requirements after 2030 exceed these targets significantly. Vistry Group highlights that meeting these stringent future requirements will likely be unattainable and could impose substantial financial constraints, affecting the viability of projects. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **DM SE3: Whole-life carbon and circular economy** | Prologis supports the overall goals of Policy SE3 to reduce lifecycle carbon emissions but finds the policy overly technical and not evidence-based. They argue that the requirements for upfront carbon, as specified in Table 4.1, fail the tests of soundness and may conflict with future national policies. Prologis suggests aligning the policy with the London Plan, allowing for flexibility with future standards, and deleting Table 4.1 to streamline the policy and encourage development. | It is considered that the need for non-residential developments to achieve a BREEAM standard of "Outstanding" is justified and that it is not appropriate to reduce the standard. London Plan policy SE2 requires that major development should be net zero-carbon towards the aim of London becoming a zero-carbon city. At a local level it is anticipated that climate change will have a significant impact on Enfield without the implementation of mitigation and adaptation measures, and obligations such as the requirement for non residential buildings, to achieve BREEAM standard of "Excellent" is necessary to ensure that net zero-carbon can be achieved. In addition it should be used in a positive way to highlight the issue of sustainable development and resource management. Furthermore, this is considered to be a short-term outlook rather than concerning the whole life-cycle of the property including on-going running costs, or potential future improvements which may be required to bring the property up to even higher environmental standards (if introduced in future). The council also considers that particularly if it is considered at the outset of a project, such projects can be achieved without adding substantial additional cost. If costs are prohibitive then the Council may agree a lower standard if specific priority measures can be achieved taking account of the site's characteristics. | No | 01905 | Prologis for Ravenside Retail Park |
| **DM SE3: Whole-life carbon and circular economy** | Places for London broadly welcome Policy SE3, and commend Enfield's commitment to reduce whole life cycle carbon emissions. With regards to Section 2 of the policy, they recommend it is clarified that the requirement to calculate whole life-cycle carbon emissions through a nationally recognised whole life cycle carbon assessment only applies to proposals 'referable to the Mayor', in accordance with Section F of London Plan Policy SI 2. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **DM SE3: Whole-life carbon and circular economy** | Blackrock UK Property Fund highlights the necessity of intensifying employment land use, often requiring demolition to accommodate increased floorspace and intensity, and thus finds the requirement for Circular Economy Statements for all major developments unnecessary and unreasonable for developments in Strategic Industrial Locations (SILs), citing a conflict between Policy SS1 and draft Policy SE3. They also argue that lifecycle carbon benchmark targets may unfairly penalize high-energy B2 and B8 uses in SILs, potentially deterring businesses from Enfield. They propose excluding employment proposals in SILs from the Circular Economy Statement requirement to avoid financial penalties and unintended negative consequences. | The council acknowledges the feedback provided by Blackrock UK Property Fund on draft Policy SE3 and its implications for employment land intensification. The council appreciates the importance of balancing sustainability objectives with the practical needs of high-energy industrial uses in SILs. While the Circular Economy Statements are crucial for promoting sustainable development, we recognize the unique challenges faced by employment-based developments in SILs. Therefore, the council is open to exploring flexible approaches that address these concerns without compromising our sustainability goals. The Council is committed to working collaboratively to refine the policy and ensure it effectively supports both environmental and economic objectives. We welcome further discussions through a Statement of Common Ground to address these issues comprehensively. | No | 01952 | Blackrock UK Property Fund |

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| **DM SE3: Whole-life carbon and circular economy** | The Home Builders Federation (HBF) argues that the policy approach is unsound as it conflicts with national policy. The Government opposes local authorities setting their own energy efficiency standards beyond current or planned building regulations, as reiterated by the Housing Minister on December 13, 2023. Such local standards increase costs and complexity for new homes, undermining economies of scale. The draft policy does not comply with the Government's requirement for additional standards to be expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) using a specified Standard Assessment Procedure (SAP). Additionally, HBF questions the policy's wisdom given the 2023 viability assessment update, noting that higher biodiversity net gain requirements (20% instead of 10%) and zero carbon targets could further harm viability, especially in the east of the Borough. | The policy was drafted prior to the written Minister Statement, and this matter will be considered further in light of any further policy updates under a new Housing Minister. | Yes | 01851 | Home Builders Federation |
| **DM SE4: Reducing energy demand and increasing low carbon energy supply** | London borough of Waltham Forest (LBWF) generally support the policies in the Climate Resilience chapter. However, Policy SE4 should consider lowering the threshold for non-residential development, similar to Waltham Forest's policies, to maximise benefits. | The support of Enfield's Climate Resilience policies is welcomed. The Council appreciate their suggestion to lower the threshold for non-residential development in Policy SE4 to align more closely with Waltham Forest's policies, thereby maximizing benefits. The Council will review this recommendation and consider its implications for enhancing climate resilience. The Council look forward to further collaboration with LBWF to ensure our policies effectively address climate resilience and deliver maximum benefits to our communities. | No | 02006 | London borough of Waltham Forest |
| **DM SE4: Reducing energy demand and increasing low carbon energy supply** | McCarthy and Stone's response highlights concerns with the draft Local Plan's climate resilience and change policies, noting that their repetitive and lengthy nature leads to confusion. They argue that, to align with Paragraph 16(d) of the NPPF, which requires plans to be clearly written and unambiguous, the section should be re-written to combine sections and clarify decision-making for development proposals. While they commend the Council's commitment to net zero carbon emissions, they caution against imposing mandatory standards that exceed government targets, suggesting that requirements should be aligned with the Government's stepped targets and proposed changes to building regulations. They reference a Ministerial Statement from December 2023, which advises against local standards exceeding national regulations due to the additional costs and complexity they introduce. The statement asserts that local energy efficiency standards beyond national regulations should be rejected unless they have a well-reasoned, robustly costed rationale. | The feedback on the climate resilience and change policies in the draft Local Plan is noted. The Council appreciate their recognition of Enfield's commitment to achieving net zero carbon emissions and their constructive suggestions for improving the clarity and consistency of the plan's policies. The Council acknowledge the need to ensure the plan's policies are clearly written and unambiguous, as required by Paragraph 16(d) of the NPPF. The council will review the relevant sections to combine and streamline the policies, ensuring it is clear how decision-makers should react to development proposals. Regarding the alignment with national targets, the council note their concerns about the potential for local standards to exceed government regulations and the associated costs. The council will carefully consider the Ministerial Statement from December 2023 and ensure that any local energy efficiency standards we propose are well-reasoned, robustly costed, and consistent with national policy.<br><br>The plan's approach is justified by the evidence provided in the Enfield Viability Update (2023) and the ELP Spatial Strategy and Overall Approach Topic Paper (2024). These documents support the need for ambitious local policies to meet Enfield's strategic objectives while ensuring that development remains viable. Specifically, the Viability Update demonstrates that the plan's policies, including those for climate resilience, have been thoroughly assessed for their economic impact, ensuring they are realistic and achievable. The ELP Spatial Strategy further reinforces the necessity of these policies in achieving sustainable development that aligns with both local and national priorities.<br><br>The council look forward to continuing to work together to create a Local Plan that effectively addresses climate resilience while being clear, practical, and aligned with national objectives. | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |
| **DM SE4: Reducing energy demand and increasing low carbon energy supply** | CCLA Investment Management acknowledges the targets in Policy SE4 but raises concerns about their viability, especially for smaller units. They suggest adopting a site-wide approach for larger projects to balance heating energy demands. The Energy Use Intensity (EUI) target of 35kWh/m2 is lower than industry norms, potentially making projects undeliverable. They recommend allowing multi-storey developments flexibility in meeting net zero targets due to unique constraints. For effective policy implementation, they propose reducing the monitoring period from five years to 1-2 years to identify performance gaps. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities |

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| **DM SE4: Reducing energy demand and increasing low carbon energy supply** | Vistry Group considers draft policy SE4, which requires LB Enfield to achieve net-zero by 2030, to be superfluous. They note that there is already a government plan to achieve net-zero homes by 2030, and all housebuilders are required to build zero carbon ready homes by 2025, making this policy redundant. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **DM SE4: Reducing energy demand and increasing low carbon energy supply** | Prologis supports reducing energy demands and supporting low carbon energy but finds Policy SE4 overly restrictive and inconsistent with national policy. They highlight concerns with prohibiting gas connections, stringent carbon reduction targets, and on-site renewable energy requirements. Prologis argues these measures may hinder development and are not justified or effective. They cite a Ministerial Statement emphasizing that local standards should not exceed national regulations without robust justification. Prologis recommends revising the policy for flexibility and deleting specific requirements like Table 4.2 to align with national guidance. | The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01905 | Prologis for Ravenside Retail Park |
| **DM SE4: Reducing energy demand and increasing low carbon energy supply** | SEGRO supports the intent of Policy SE4, which requires non-residential development over 500 sqm GIA to be net-zero carbon but allows for off-site provision or a cash in lieu contribution if on-site savings are unachievable. SEGRO highlights that this requirement might be difficult for extensions to existing buildings or multi-storey industrial uses, which already face viability challenges. They also express concerns about the uniformity of the cash in-lieu contribution across different employment types and residential uses, suggesting lower rates for employment uses to ensure feasibility. | The council appreciates SEGRO's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with SEGRO and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01922 | SEGRO |
| **DM SE4: Reducing energy demand and increasing low carbon energy supply** | Places for London strongly support Section 5 of Policy SE4, which states that 'roof space should be optimised to deliver PVs, Air Source Heat Pumps, and/ or green roofs'. They commend that Enfield recognise Air Source Heat Pumps to be alternative low carbon sources with the continuing decarbonisation with the National Grid, and Places for London will continue to strive towards delivering schemes which maximise energy efficiency and reduce carbon footprint.<br>Places for London also suggest that Enfield Council include a caveat regarding feasibility within Section 10 of Policy SE4, amending the sentence 'Developments should seek to connect to a decentralised energy network where the operator is willing to extend' to include 'where feasible'. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **DM SE4: Reducing energy demand and increasing low carbon energy supply** | Blackrock UK Property Fund's response highlights several concerns with the draft policy. They point out an inconsistency in the application thresholds, noting that while major residential developments are defined as ten or more dwellings, non-residential developments are set at 500 sq m, whereas the threshold for such developments is typically 1,000 sq m. They argue for consistency across the policy. Additionally, they emphasize that gas connections might be necessary for some employment occupiers and should not be restricted. Blackrock UK Property Fund also questions the feasibility of the energy generation targets, particularly for industrial buildings with structural limitations and specific design requirements. They argue that the requirement for green roofs is often impractical for these buildings. Moreover, they express concerns about the viability of energy centres for industrial developments, particularly given land ownership and connectivity constraints, and argue that such requirements could hinder the effective use of employment land. They suggest revisions to ensure the policy is realistic and aligned with the operational needs of industrial developments. | The detailed feedback on the draft policy is welcomed and. The Council values Blackrock's insights and understand the need for clarity and feasibility in Enfield's policies.<br><br>Threshold Inconsistencies: The Council acknowledges their concern regarding the inconsistencies in the application thresholds for residential and non-residential developments. The differentiation aims to address the varied impacts and requirements of different types of developments. However, the Council will review this to ensure clarity and justification, aligning with best practices and legislative guidelines.<br><br>Gas Connections for Employment Uses: the council recognizes that certain industrial and employment uses may require gas connections to meet their specific operational needs. While policy prioritizes low-carbon heating and hot water systems to meet Enfield's sustainability goals, the council understands that flexibility is necessary. Therefore, the Council will consider incorporating exceptions for essential operational requirements. | No | 01952 | Blackrock UK Property Fund |

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| | | Feasibility of Energy Generation Targets: The council appreciates their concerns about the feasibility of meeting energy generation targets, especially for industrial buildings with structural and design constraints. Enfield's goal is to balance sustainability with practical implementation. The Council will re-evaluate the targets and consider adjustments to reflect the realistic capabilities of different building types, ensuring that they do not unduly burden industrial developments.<br><br>Green Roof Requirements: the council understands that structural limitations can make the installation of green roofs challenging for industrial buildings. The policy aims to enhance environmental sustainability, but the Council will ensure that requirements are practical and achievable, taking into account the specific characteristics of industrial structures.<br><br>Energy Centres for Large-scale Developments: The requirement for new energy centres is intended to promote energy efficiency and sustainability. However, the council recognizes the challenges posed by land ownership, connectivity constraints, and the practical needs of industrial occupiers. The Council will review the feasibility of this requirement and consider more flexible approaches that do not compromise the primary use and effectiveness of employment lands.<br><br>The Council appreciates Blackrock's engagement and willingness to work collaboratively. The Council will enter into further discussions and the development of a Statement of Common Ground to ensure that Enfield's policies are both ambitious and achievable, fostering sustainable growth and meeting the needs of all stakeholders. | | | |
| **DM SE4: Reducing energy demand and increasing low carbon energy supply** | BL Logistics Investment Limited (British Land) supports Draft DM Policy SE4's goal of reducing energy demand. However, they believe the Energy Use Intensity (EUI) values in Table 4.2 exceed the standards set by the current London Plan: 'Energy Assessment Guidance' (June 2022). Specifically, the target for industrial buildings and warehouses should be 55 kWh/m²GIA/yr, not 35 kWh/m²GIA/yr. They recommend amending this and replacing Table 4.2 with the equivalent table from the GLA guidance to ensure consistency. British Land also references the Written Ministerial Statement from December 13, 2023, by the Department for Levelling Up, Housing and Communities. This statement advises that local energy efficiency standards should not exceed those set by current or planned building regulations, as multiple local standards can increase building costs and complexity. Therefore, they assert that the Council's local policy requirements should align with strategic policies in the London Plan to avoid redundant layering of regulations. | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **DM SE4: Reducing energy demand and increasing low carbon energy supply** | The Home Builders Federation (HBF) argues that the draft policy on operational energy is unsound as it contradicts national policy. The Government's stepped programme aims for zero carbon homes by 2030, requiring homes to be zero carbon ready by 2025. Housing Minister Lee Rowley's statement on December 13, 2023, emphasized that local standards exceeding national regulations add costs, complexity, and undermine economies of scale. National standards provide clarity and consistency, essential for investment in net-zero ready homes.<br><br>HBF highlights that local energy efficiency standards should not exceed national regulations unless they are well-reasoned, robustly costed, and ensure development viability and housing supply. Such standards should be expressed as a percentage uplift of the dwelling's Target Emissions Rate (TER) using a specified Standard Assessment Procedure (SAP).<br><br>HBF also raises concerns about the policy's impact on development viability, particularly in the east of the Borough, noting that higher biodiversity net gain requirements (20% instead of 10%) could further harm viability. They recommend that the Council adheres to national policy to avoid unnecessary obstacles to vital housebuilding in London. | The policy was drafted prior to the written Minister Statement, and this matter will be considered further in light of any further policy updates under a new Housing Minister. | Yes | 01851 | Home Builders Federation |

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| **DM SE4: Reducing energy demand and increasing low carbon energy supply** | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) supports the statutory duty on climate change and the ambitions outlined in the Climate Change Act 2008, as well as the policies in the London Plan 2021 and the NPPF. While supporting Enfield Local Plan's (ELP) Chapter 4 on climate resilience and Policy SE4, Encaf argues that the absence of an Energy Masterplan (EMP) renders ELP legally non-compliant and unsound. The lack of an EMP undermines strategic policy thrusts, fails to ensure the lowest carbon emissions, and does not provide a clear route to net zero. Encaf suggests the urgent preparation of an EMP for the ELP to be sound and legally compliant. They highlight the importance of transparency and adherence to policies seen in other boroughs like Bexley and Waltham Forest. Without an EMP, significant stakeholders in Enfield are operating in a policy vacuum, leading to decisions that impede carbon reduction efforts. | Comments noted. The council acknowledges Encaf's concerns but asserts that the Enfield Local Plan (ELP) is both sound and legally compliant. The plan aligns with the Climate Change Act 2008 and the London Plan 2021 by supporting decentralised energy networks and aiming for net-zero carbon emissions. The ELP is supported by the "Delivering Net Zero" strategy, which provides a comprehensive framework for reducing emissions and enhancing energy efficiency across the borough. This strategy ensures the ELP's policies are robust and adequately address climate resilience and sustainability goals. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **DM SE5: Renewable energy development** | McCarthy and Stone's response highlights concerns with the draft Local Plan's climate resilience and change policies, noting that their repetitive and lengthy nature leads to confusion. They argue that, to align with Paragraph 16(d) of the NPPF, which requires plans to be clearly written and unambiguous, the section should be re-written to combine sections and clarify decision-making for development proposals. While they commend the Council's commitment to net zero carbon emissions, they caution against imposing mandatory standards that exceed government targets, suggesting that requirements should be aligned with the Government's stepped targets and proposed changes to building regulations. They reference a Ministerial Statement from December 2023, which advises against local standards exceeding national regulations due to the additional costs and complexity they introduce. The statement asserts that local energy efficiency standards beyond national regulations should be rejected unless they have a well-reasoned, robustly costed rationale. | The feedback on the climate resilience and change policies in the draft Local Plan is noted. The Council appreciate their recognition of Enfield's commitment to achieving net zero carbon emissions and their constructive suggestions for improving the clarity and consistency of the plan's policies. The Council acknowledge the need to ensure the plan's policies are clearly written and unambiguous, as required by Paragraph 16(d) of the NPPF. The council will review the relevant sections to combine and streamline the policies, ensuring it is clear how decision-makers should react to development proposals. Regarding the alignment with national targets, the council note their concerns about the potential for local standards to exceed government regulations and the associated costs. The council will carefully consider the Ministerial Statement from December 2023 and ensure that any local energy efficiency standards we propose are well-reasoned, robustly costed, and consistent with national policy.<br><br>The plan's approach is justified by the evidence provided in the Enfield Viability Update (2023) and the ELP Spatial Strategy and Overall Approach Topic Paper (2024). These documents support the need for ambitious local policies to meet Enfield's strategic objectives while ensuring that development remains viable. Specifically, the Viability Update demonstrates that the plan's policies, including those for climate resilience, have been thoroughly assessed for their economic impact, ensuring they are realistic and achievable. The ELP Spatial Strategy further reinforces the necessity of these policies in achieving sustainable development that aligns with both local and national priorities.<br><br>The council look forward to continuing to work together to create a Local Plan that effectively addresses climate resilience while being clear, practical, and aligned with national objectives. | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |
| **DM SE5: Renewable energy development** | Better Homes Enfield critiques the Enfield Local Plan (ELP) regarding its handling of the Energetik District Heat Network (EDHN), a major infrastructure project owned by Enfield Council. The group raises concerns about a potential conflict of interest, as the Local Planning Authority, which is responsible for approving energy supply proposals for new developments, is also the sole owner of the district heat network provider. The document argues that the current ELP policies do not provide sufficient guidance or requirements to ensure that energy supply decisions are balanced, transparent, and focused on delivering the lowest carbon emissions. Specifically, it calls for the inclusion of clear policies that require comprehensive assessments of alternative energy solutions, such as air source heat pumps, to ensure that connecting to the EDHN is genuinely the best option for reducing carbon emissions. The group also addresses the lack of detailed guidance in the ELP concerning the rollout of the EDHN, particularly the installation of around 2000 km of pipework across Enfield. It recommends that the ELP include specific policies that guide the planning, installation, and impact mitigation of the EDHN, in line with London Plan Policy SI3, which mandates the creation of an Energy Masterplan. The critique also highlights the need for clear information in Energy Masterplanning or Energy Statements for developments that justify the connection | Comments noted. The Council acknowledge Better Homes Enfield's concerns regarding Enfield Council's ownership of Energetik and its implications for energy supply decisions in the Local Plan. We recognize the potential conflict of interest in the Council's dual role as both the planning authority and the owner of Energetik. We assure that all energy supply decisions are made transparently and focus on delivering the lowest carbon options. While Energetik's district heat network using heat from the Edmonton Incinerator is one solution, planning policies will ensure that alternative lower carbon options, such as Air Source Heat Pumps, are properly considered and compared. This approach aligns with the council's commitment to achieving significant carbon reductions and meeting broader sustainability goals. | Yes | 01708 | Better Homes Enfield |

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| | to the district heat network based on a comparison with modern alternatives, rather than outdated gas-fueled systems. Overall, the document suggests that the ELP's current approach leaves the EDHN operating in a policy vacuum, risking suboptimal outcomes in terms of climate change mitigation and the protection of transport and green infrastructure. | | | | |
| **DM SE6: Climate change adaptation and managing heat risk** | McCarthy and Stone's response highlights concerns with the draft Local Plan's climate resilience and change policies, noting that their repetitive and lengthy nature leads to confusion. They argue that, to align with Paragraph 16(d) of the NPPF, which requires plans to be clearly written and unambiguous, the section should be re-written to combine sections and clarify decision-making for development proposals. While they commend the Council's commitment to net zero carbon emissions, they caution against imposing mandatory standards that exceed government targets, suggesting that requirements should be aligned with the Government's stepped targets and proposed changes to building regulations. They reference a Ministerial Statement from December 2023, which advises against local standards exceeding national regulations due to the additional costs and complexity they introduce. The statement asserts that local energy efficiency standards beyond national regulations should be rejected unless they have a well-reasoned, robustly costed rationale. | The feedback on the climate resilience and change policies in the draft Local Plan is noted. The Council appreciate their recognition of Enfield's commitment to achieving net zero carbon emissions and their constructive suggestions for improving the clarity and consistency of the plan's policies. The Council acknowledge the need to ensure the plan's policies are clearly written and unambiguous, as required by Paragraph 16(d) of the NPPF. The council will review the relevant sections to combine and streamline the policies, ensuring it is clear how decision-makers should react to development proposals. Regarding the alignment with national targets, the council note their concerns about the potential for local standards to exceed government regulations and the associated costs. The council will carefully consider the Ministerial Statement from December 2023 and ensure that any local energy efficiency standards we propose are well-reasoned, robustly costed, and consistent with national policy.<br><br>The plan's approach is justified by the evidence provided in the Enfield Viability Update (2023) and the ELP Spatial Strategy and Overall Approach Topic Paper (2024). These documents support the need for ambitious local policies to meet Enfield's strategic objectives while ensuring that development remains viable. Specifically, the Viability Update demonstrates that the plan's policies, including those for climate resilience, have been thoroughly assessed for their economic impact, ensuring they are realistic and achievable. The ELP Spatial Strategy further reinforces the necessity of these policies in achieving sustainable development that aligns with both local and national priorities.<br><br>The council look forward to continuing to work together to create a Local Plan that effectively addresses climate resilience while being clear, practical, and aligned with national objectives. | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |
| **DM SE6: Climate change adaptation and managing heat risk** | CCLA Investment Management emphasizes the need to balance environmental considerations with the practical realities of development in Policy SE6 to avoid undue burdens on stakeholders. They argue that the policy is currently not compliant with NPPF paragraph 35(b) and should avoid introducing overly onerous requirements unless fully justified by appropriate evidence. This balance is essential to ensure the viability of development projects while supporting sustainable outcomes. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **DM SE6: Climate change adaptation and managing heat risk** | Vistry Group supports minimising overheating risk in new residential developments but questions the appropriateness of mandating external and passive shading devices in point 2b, citing potential negative impacts on building design. They suggest flexibility to ensure shading devices do not compromise design quality. Additionally, Vistry seeks clarification on point 2c regarding compliance expectations when assessing proposals against 2050 weather files, to better understand the standards required. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **DM SE6: Climate change** | Blackrock UK Property Fund considers the draft policy to be overly broad as it applies to all applications, including smaller proposals and changes of use. They argue that this will add unnecessary burdens and is inconsistent with Section 62 | The feedback on the draft policy is welcmed. The Council acknowledges their concern regarding the broad application of the policy. The Council aims to ensure that its policies are practical and proportionate. The Council is open to refining the | No | 01952 | Blackrock UK Property Fund |

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| **adaptation and managing heat risk** | (4A) of the 1990 Town and Country Planning Act. They suggest that the policy should only apply to major development proposals. Position: Object. Proposed Change: "1. Major Development proposals will be required to:" | policy to better align with legislative requirements and reduce unnecessary burdens on smaller proposals and is willing to working with Blackrock through a Statement of Common Ground to achieve a balanced and effective policy framework. | | | |
| **DM SE6: Climate change adaptation and managing heat risk** | BL Logistics Investment Limited (British Land) supports the aims of Draft Policy SE6 but suggests amendments to parts 2) and 2) a) and b). They propose making it explicit that applying the cooling hierarchy and including passive measures and external shading should be subject to technical feasibility and scheme viability, as acknowledged in supporting paragraph 4.37. This clarification should be included in the main body of the policy. Additionally, they emphasise that, as stated in the Written Ministerial Statement, local policy requirements should align with the London Plan and not be more onerous, to avoid redundant layering of regulations. | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **DM SE7: Managing flood risk** | The Environment Agency supports Policy SE7 – Managing Flood Risk. They recommend including the EA as a key stakeholder for early engagement and encourage applicants to seek pre-application advice from the EA for managing flood risk. The EA also strongly supports the inclusion of an 8-meter setback in point 6 of the policy. | The council welcomes the support to Policy SE7 – Managing Flood Risk. We will ensure that the Environment Agency is recognized as a key stakeholder for early engagement, and we encourage applicants to seek pre-application advice from the EA for managing flood risk. We are committed to working collaboratively with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |
| **DM SE7: Managing flood risk** | London borough of Waltham Forest (LBWF) generally support the approach to managing and mitigating flood risk in the borough. While the current position is robust, they recommend adding specific references to Sustainable Drainage Systems (SuDS) and their positive impact on biodiversity net gain and urban greening that their delivery brings, at the site SFRA level. To ensure developments that cannot adequately mitigate flooding on or off-site, they recommend a payment in lieu should be sought through Policy SE7. | The supportive feedback regarding Enfield's approach to managing and mitigating flood risk in the borough is welcomed. The Council acknowledge the importance of incorporating Sustainable Drainage Systems (SuDS) and their benefits for biodiversity net gain and urban greening at the site-specific Flood Risk Assessment (SFRA) level. The Council also appreciate LBWF's suggestion of seeking payments in lieu for developments that cannot adequately mitigate flooding on or off-site. The Council propose further engagement to discuss these recommendations and explore the integration of these elements into Policy SE7. The Council look forward to collaborating with LBWF to enhance our flood risk management strategies. | No | 02006 | London borough of Waltham Forest |
| **DM SE7: Managing flood risk** | Thames Water supports the reference to sewer flooding in Policy SE7, aligning with the National Planning Practice Guidance's sequential approach for flood risk areas, including sewer flooding. They emphasize that water and sewerage infrastructure might need to be developed in flood risk zones due to their proximity to rivers for water treatment and effluent discharge. Flood risk sustainability objectives should recognize the necessity of such infrastructure developments in these areas to accommodate new development needs. | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with Thames Water to support responsible development and maintain essential services. | Yes | 01681 | Thames Water |
| **DM SE7: Managing flood risk** | McCarthy and Stone's response highlights concerns with the draft Local Plan's climate resilience and change policies, noting that their repetitive and lengthy nature leads to confusion. They argue that, to align with Paragraph 16(d) of the NPPF, which requires plans to be clearly written and unambiguous, the section should be re-written to combine sections and clarify decision-making for development proposals. While they commend the Council's commitment to net zero carbon emissions, they caution against imposing mandatory standards that exceed government targets, suggesting that requirements should be aligned with the Government's stepped targets and proposed changes to building regulations. They reference a Ministerial Statement from December 2023, which advises against local standards exceeding national regulations due to the additional costs and complexity they introduce. The statement asserts that local energy efficiency standards beyond national regulations should be rejected unless they have a well-reasoned, robustly costed rationale. | The feedback on the climate resilience and change policies in the draft Local Plan is noted. The Council appreciate their recognition of Enfield's commitment to achieving net zero carbon emissions and their constructive suggestions for improving the clarity and consistency of the plan's policies. The Council acknowledge the need to ensure the plan's policies are clearly written and unambiguous, as required by Paragraph 16(d) of the NPPF. The council will review the relevant sections to combine and streamline the policies, ensuring it is clear how decision-makers should react to development proposals. Regarding the alignment with national targets, the council note their concerns about the potential for local standards to exceed government regulations and the associated costs. The council will carefully consider the Ministerial Statement from December 2023 and ensure that any local energy efficiency standards we propose are well-reasoned, robustly costed, and consistent with national policy.<br><br>The plan's approach is justified by the evidence provided in the Enfield Viability Update (2023) and the ELP Spatial Strategy and Overall Approach Topic Paper | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |

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| | | (2024). These documents support the need for ambitious local policies to meet Enfield's strategic objectives while ensuring that development remains viable. Specifically, the Viability Update demonstrates that the plan's policies, including those for climate resilience, have been thoroughly assessed for their economic impact, ensuring they are realistic and achievable. The ELP Spatial Strategy further reinforces the necessity of these policies in achieving sustainable development that aligns with both local and national priorities.<br><br>The council look forward to continuing to work together to create a Local Plan that effectively addresses climate resilience while being clear, practical, and aligned with national objectives. | | | |
| **DM SE7: Managing flood risk** | Prologis supports managing flood risk but finds Policy SE7's requirement for an 8-meter setback from culverts and watercourses too rigid. They note Policy SE8's more flexible approach, which is preferred. Prologis argues that SE7 is not justified or effective, as it would hinder development at sites like RRP, where an 8-meter setback is unfeasible. They recommend amending SE7 for flexibility, allowing setbacks to be determined in consultation with relevant agencies and justified based on specific site conditions. | The council appreciates Prologis' support and acknowledges the concerns regarding the wording of PL5. The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01905 | Prologis for Ravenside Retail Park |
| **DM SE7: Managing flood risk** | Blackrock UK Property Fund's response highlights the challenge of intensifying employment land in Strategic Industrial Locations (SIL), where naturalising culverted watercourses and providing 8-meter setbacks could significantly impact land use. They suggest that the policy requirements regarding existing culverts and underground watercourses should balance with other Local Plan objectives, particularly in SIL areas. They propose a policy change to allow for robust justification and evidence when less than an 8-meter setback is proposed, ensuring other Local Plan objectives are considered.<br><br>Proposed Changes:<br>*Developments near culverts and watercourses should have a minimum 8-meter setback (unless agreed otherwise with relevant authorities) to facilitate naturalisation and ecological enhancements. If less than 8 meters is proposed, it must be robustly justified and evidenced, considering other adopted Local Plan objectives.* | The Council appreciates Blackrock's feedback on the draft policy concerning watercourse setbacks in SIL areas. The plan's policy is based on robust evidence, including the Flood Risk Assessments and the Blue and Green Strategy, which support ecological enhancements and flood risk management. The Council recognize the need for flexibility to balance these environmental goals with the practicalities of land intensification in SIL areas. Therefore, the Council is open to refining the policy to allow for robust justification and evidence when a less than 8-meter setback is proposed, ensuring it aligns with broader Local Plan objectives and is willing to working together through a Statement of Common Ground to achieve this balance. | No | 01952 | Blackrock UK Property Fund |
| **DM SE8: Protection and improvement of watercourses** | The Environment Agency supports Policy SE8 – Protection and Improvement of Watercourses but recommends that the supporting text includes an explanation of the importance of protecting watercourses for water quality, habitat availability, and ecological connectivity. They also strongly suggest that paragraph 1.a. reiterates the importance of an 8-meter setback or refers users back to Policy SE7 for consistency. | The council welcomes the support to Policy SE8 – Protection and Improvement of Watercourses. We will consider including further explanation in the supporting text regarding the importance of watercourses for water quality, habitat availability, and ecological connectivity. Additionally, we will review paragraph 1.a. to ensure the requirement for an 8-meter setback is clearly reiterated, or cross-referenced to Policy SE7 for consistency. We are committed to working collaboratively with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |
| **DM SE8: Protection and improvement of watercourses** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman's property within the development boundary, the reduction of green open space, and the conflict with Enfield's Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |
| **DM SE8: Protection and** | McCarthy and Stone's response highlights concerns with the draft Local Plan's climate resilience and change policies, noting that their repetitive and lengthy nature leads to confusion. They argue that, to align with Paragraph 16(d) of the | The feedback on the climate resilience and change policies in the draft Local Plan is noted. The Council appreciate their recognition of Enfield's commitment to achieving net zero carbon emissions and their constructive suggestions for | No | 01867 | McCarthy & Stone |

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| **improvement of watercourses** | NPPF, which requires plans to be clearly written and unambiguous, the section should be re-written to combine sections and clarify decision-making for development proposals. While they commend the Council's commitment to net zero carbon emissions, they caution against imposing mandatory standards that exceed government targets, suggesting that requirements should be aligned with the Government's stepped targets and proposed changes to building regulations. They reference a Ministerial Statement from December 2023, which advises against local standards exceeding national regulations due to the additional costs and complexity they introduce. The statement asserts that local energy efficiency standards beyond national regulations should be rejected unless they have a well-reasoned, robustly costed rationale. | improving the clarity and consistency of the plan's policies. The Council acknowledge the need to ensure the plan's policies are clearly written and unambiguous, as required by Paragraph 16(d) of the NPPF. The council will review the relevant sections to combine and streamline the policies, ensuring it is clear how decision-makers should react to development proposals. Regarding the alignment with national targets, the council note their concerns about the potential for local standards to exceed government regulations and the associated costs. The council will carefully consider the Ministerial Statement from December 2023 and ensure that any local energy efficiency standards we propose are well-reasoned, robustly costed, and consistent with national policy.<br><br>The plan's approach is justified by the evidence provided in the Enfield Viability Update (2023) and the ELP Spatial Strategy and Overall Approach Topic Paper (2024). These documents support the need for ambitious local policies to meet Enfield's strategic objectives while ensuring that development remains viable. Specifically, the Viability Update demonstrates that the plan's policies, including those for climate resilience, have been thoroughly assessed for their economic impact, ensuring they are realistic and achievable. The ELP Spatial Strategy further reinforces the necessity of these policies in achieving sustainable development that aligns with both local and national priorities.<br><br>The council look forward to continuing to work together to create a Local Plan that effectively addresses climate resilience while being clear, practical, and aligned with national objectives. | | | Retirement Lifestyles Ltd |
| **DM SE8: Protection and improvement of watercourses** | Prologis supports managing flood risk but finds Policy SE7's requirement for an 8-meter setback from culverts and watercourses too rigid. They note Policy SE8's more flexible approach, which is preferred. Prologis argues that SE7 is not justified or effective, as it would hinder development at sites like RRP, where an 8-meter setback is unfeasible. They recommend amending SE7 for flexibility, allowing setbacks to be determined in consultation with relevant agencies and justified based on specific site conditions. | The council appreciates Prologis' support and acknowledges the concerns regarding the wording of PL5. The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01905 | Prologis for Ravenside Retail Park |
| **DM SE8: Protection and improvement of watercourses** | The Canal & River Trust notes that Policy SE8 positively incorporates additions to Part 1c regarding waterway infrastructure, flood risk, and land instability based on previous feedback. However, Paragraph 4.50 should be expanded to provide developers and decision-makers with a detailed explanation of considerations related to the River Lee Navigation (RLN). Key points include that waterway walls, not designed for modern loadings, are at risk from additional loadings like buildings, scaffolding, and construction equipment, which can cause structural instability. Canals retain water through a combination of construction methods, and nearby excavation can lead to leaks or collapses. Many Trust assets are over 200 years old, and activities causing ground vibrations can accelerate degradation and potential collapse of waterway structures. | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |
| **DM SE9: Sustainable drainage systems** | Thames Water emphasizes the importance of developers managing surface water drainage properly to reduce the risk of sewer flooding and maximize foul sewage capacity. They advocate for SuDS to limit surface water entering the public sewer system, helping the sewerage network accommodate population growth and climate change effects. SuDS also offer benefits like improved water quality, enhanced landscapes, wildlife support, and recreational opportunities. Thames Water requests including in the Neighbourhood Plan that developers must not allow surface water to drain into the foul sewer and to restrict surface water discharge rates in line with CIRIA guidance. | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with Thames Water to support responsible development and maintain essential services. | Yes | 01681 | Thames Water |
| **DM SE9: Sustainable drainage systems** | Savills, on behalf of Asda, generally supports the remainder of the Enfield Local Plan but recommends ensuring flexibility within detailed policies to apply them appropriately. They note that several policies, such as SE2 (Sustainable Design and Construction Statement), SE9 (use of SuDS), DE3 (creating accessible | The council welcomes Asda's general support of the Enfield Local Plan. The Council appreciate their feedback on ensuring flexibility within detailed policies to apply them appropriately. The Council will consider amending the policy wording to include "where applicable to the type of development and appropriate to do so," | Yes | 01732 | Asda Stores Ltd |

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| | spaces), DE7 (improving public realm quality), and DE11 (landscaping schemes), apply to "all development." However, Savills argues that it may be impractical or disproportionate for minor developments to meet these requirements. They suggest amending the policy wording to include "where applicable to the type of development and appropriate to do so" to accommodate the varying nature of development proposals. | particularly for policies SE2, SE9, DE3, DE7, and DE11. This adjustment aims to accommodate the varying nature of development proposals while maintaining the council's commitment to sustainable design and quality public spaces. This approach ensures that policies are practical and proportionate, aligning with Enfield's sustainable development goals as outlined in the Enfield Viability Update. | | | |
| **DM SE9: Sustainable drainage systems** | McCarthy and Stone's response highlights concerns with the draft Local Plan's climate resilience and change policies, noting that their repetitive and lengthy nature leads to confusion. They argue that, to align with Paragraph 16(d) of the NPPF, which requires plans to be clearly written and unambiguous, the section should be re-written to combine sections and clarify decision-making for development proposals. While they commend the Council's commitment to net zero carbon emissions, they caution against imposing mandatory standards that exceed government targets, suggesting that requirements should be aligned with the Government's stepped targets and proposed changes to building regulations. They reference a Ministerial Statement from December 2023, which advises against local standards exceeding national regulations due to the additional costs and complexity they introduce. The statement asserts that local energy efficiency standards beyond national regulations should be rejected unless they have a well-reasoned, robustly costed rationale. | The feedback on the climate resilience and change policies in the draft Local Plan is noted. The Council appreciate their recognition of Enfield's commitment to achieving net zero carbon emissions and their constructive suggestions for improving the clarity and consistency of the plan's policies. The Council acknowledge the need to ensure the plan's policies are clearly written and unambiguous, as required by Paragraph 16(d) of the NPPF. The council will review the relevant sections to combine and streamline the policies, ensuring it is clear how decision-makers should react to development proposals. Regarding the alignment with national targets, the council note their concerns about the potential for local standards to exceed government regulations and the associated costs. The council will carefully consider the Ministerial Statement from December 2023 and ensure that any local energy efficiency standards we propose are well-reasoned, robustly costed, and consistent with national policy.<br><br>The plan's approach is justified by the evidence provided in the Enfield Viability Update (2023) and the ELP Spatial Strategy and Overall Approach Topic Paper (2024). These documents support the need for ambitious local policies to meet Enfield's strategic objectives while ensuring that development remains viable. Specifically, the Viability Update demonstrates that the plan's policies, including those for climate resilience, have been thoroughly assessed for their economic impact, ensuring they are realistic and achievable. The ELP Spatial Strategy further reinforces the necessity of these policies in achieving sustainable development that aligns with both local and national priorities.<br><br>The council look forward to continuing to work together to create a Local Plan that effectively addresses climate resilience while being clear, practical, and aligned with national objectives. | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |
| **DM SE9: Sustainable drainage systems** | CCLA Investment Management highlights that the requirement for achieving greenfield runoff rates in Policy SE9 is not compliant with Policy SI 13 of the London Plan and NPPF paragraph 35(d). They propose that the policy should be amended to state that major developments should aim to achieve greenfield runoff rates or as close as possible, ensuring compliance with the London Plan. This amendment would align the policy with NPPF guidelines and make it more practical for developers. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **DM SE9: Sustainable drainage systems** | Blackrock UK Property Fund's response highlights that industrial development must meet the operational requirements of occupiers, including accommodating heavy goods vehicles (HGVs) and service areas, which necessitate reinforced concrete. Additionally, industrial buildings often cannot support green roofs. Consequently, the absolute requirement for SuDS (Sustainable Drainage Systems) features to control the first 5mm of rainfall is challenging for industrial developments. The policy should acknowledge these challenges and incorporate greater flexibility to ensure its reasonable implementation without hindering certain forms of development. Proposed changes include specifying that source control | The detailed feedback on the draft policy regarding SuDS features in industrial developments is welcomed. The Council recognizes the unique challenges posed by industrial sites, including the need for reinforced concrete to accommodate HGVs and the impracticality of green roofs in such settings. The requirement for SuDS features is based on best practices to manage stormwater runoff and reduce pollution, as outlined in our evidence base. However, the Council understands the necessity of flexibility to ensure the policy is practical and does not unduly constrain industrial development. The Council will consider incorporating language that allows for greater flexibility, ensuring SuDS measures are utilized where feasible and taking into account site-specific characteristics and | No | 01952 | Blackrock UK Property Fund |

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| | SuDS measures must be utilized where feasible, considering site characteristics and intended use. | intended land use. This approach aligns with our commitment to sustainable development while supporting the operational needs of industrial occupiers. The council will engage with Blackrock further to refine this policy through a Statement of Common Ground, ensuring it meets both environmental objectives and the practical requirements of industrial developments. | | | |
| **DM SE9: Sustainable drainage systems** | The Canal & River Trust agrees that, subject to its consideration of environmental and operational issues, surface water can be drained into waterways as part of SuDS. The supporting text of Policy SE9 should recognize the need for Trust agreement for discharges to the River Lee Navigation (RLN) and encourage pre-application discussions. Additionally, as Pymmes Brook and Salmons Brook are tributaries of the RLN, the Trust welcomes dialogue with the Lead Local Flood Authority (LLFA) for significant discharges, especially near where these waterways flow into the RLN. | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |
| **DM SE9: Sustainable drainage systems** | The Canal & River Trust supports the Council's goals for an integrated, multifunctional, and accessible blue and green infrastructure network to address deficiencies in quantity, quality, and access across the Borough. However, significant rewilding and naturalization of the River Lee Navigation (RLN) are unlikely due to its navigable function. The inclusion of specific references to the RLN in Part 1g is positive. The Trust suggests that planning policies support additional residential moorings in appropriate locations and require new waterside developments to facilitate these moorings by providing access routes, space for services, or utilities connections. Further details are provided in comments on Policy BG9. | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |
| **Chapter 5: Addressing Equality and improving Health and Wellbeing** | | | | | |
| **SP SC1: Improving health and wellbeing of Enfield's diverse communities** | The NHS London Healthy Urban Development Unit supports SC1's aim to contribute towards active and healthy lifestyles and recommends adding a requirement for development proposals to plan for and optimize these lifestyles, including measures to reduce health inequalities. They also welcome the requirement for Health Impact Assessments for large schemes and suggest it should be a validation requirement to ensure health considerations are integrated from the early design stages. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP SC1: Improving health and wellbeing of Enfield's diverse communities** | The NHS London Healthy Urban Development Unit (HUDU) supports the use of the HUDU model and Health Impact Assessments (HIAs) for residential developments exceeding 50 dwellings but questions this threshold, proposing HIAs for sensitive schemes like hot food takeaways and housing in areas with poor air quality. HUDU advocates for flexibility, suggesting that either a Health Checklist or a full/rapid HIA be required for such cases. They back Objective 4 of the Integrated Impact Assessment (IIA) aimed at enhancing health and reducing inequalities but express concerns about the environmental and health impacts of Green Belt developments, such as inadequate GP services and increased car use. HUDU calls for timely planning of new infrastructure and services, recommends NHS consultation on plan updates, and supports the inclusion of health and wellbeing monitoring indicators in the plan for IIA compliance. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP SC1: Improving health and wellbeing of Enfield's diverse communities** | TfL reiterate their comment that it would be helpful to confirm support for the Healthy Streets Approach to ensure consistency with other sections of the Local Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP SC1: Improving health and wellbeing of** | London borough of Waltham Forest (LBWF) response to Enfield's draft Local Plan 2039, which outlines its approach to health and well-being in urban planning, is largely positive and supportive. The response recognizes and commends Enfield's comprehensive and inclusive approach, which aims to reduce health inequalities | The positive and supportive feedback on Enfield's draft Local Plan is welcomed, especially regarding Enfield's approach to health and well-being. The Council appreciate their recognition of Enfield's efforts to reduce health inequalities and promote active, healthy lifestyles through inclusive urban planning. The Council | No | 02006 | London borough of Waltham Forest |

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| **Enfield's diverse communities** | and facilitate access to essential services and infrastructure that promote active, healthy lifestyles. It also supports Enfield's focus on integrating health impact assessments (HIAs) for significant developments, which aligns well with LB Waltham Forest's own policies. Moreover, the response encourages addressing specific areas such as regulating hot food takeaways and payday loans, which have proven effective in LB Waltham Forest at mitigating health risks and addressing social issues associated with them. The response believes that implementing these targeted policies can significantly contribute to public health and social well-being and promote a more holistic approach to planning and community health. The response also provides constructive feedback and suggestions for enhancing Enfield's approach and achieving better health outcomes for its residents. | value their constructive suggestions, particularly on regulating hot food takeaways and payday loans, and will consider these to further enhance our policies. Their insights are crucial as Enfield aim to achieve better health outcomes for its residents. | | | |
| **SP SC1: Improving health and wellbeing of Enfield's diverse communities** | McCarthy and Stone address Policy SC1, which requires the submission of a Health Impact Assessment (HIA) for residential developments over 50 units. They argue that older persons' housing should not be perceived as a burden on healthcare infrastructure. Instead, the policy should acknowledge the significant health benefits such housing brings to individuals. They highlight that older persons' housing promotes better physical and mental health, reduces demands on health and social services, and allows for more efficient public resource use. McCarthy and Stone reference a report by WPI Strategy for Homes for Later Living, which details fiscal and well-being benefits, including annual NHS and social care savings of approximately £3,500 per resident and improved happiness and life satisfaction for older individuals. They emphasize that purpose-built housing for older people provides safe, warm, and adaptable living environments, contrasting with older homes that often present various health risks. | Noted. The Council is committed to working collaboratively with stakeholders like McCarthy and Stone to refine the plan's policies and ensure they are aligned with national guidelines and address the housing needs of all community groups effectively. The council look forward to further engagement to achieve these objectives. | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |
| **SP SC1: Improving health and wellbeing of Enfield's diverse communities** | NHS Property Services (NHSPS) welcomes and supports Draft Policy SC1, which commits to promoting healthier lifestyles and improving overall health and wellbeing through new developments. They endorse the requirement for Health Impact Assessments on larger residential developments, major strategic developments in areas with poor air quality, and significant education, health, leisure, and community facilities. NHSPS emphasizes the established link between planning and health, highlighting the planning system's crucial role in creating healthy communities and addressing wider health determinants. NHSPS considers the current wording of Draft Policy SC1 to be sound. | Support noted. | No | 01985 | NHS Property Services |
| **SP SC1: Improving health and wellbeing of Enfield's diverse communities** | Enfield Climate Action Forum - Air Pollution Working Group's (EnCaf - APWG) response to the Air Quality Assessment (AQA) highlights concerns that the developments proposed in the Draft Local Plan will mostly negatively impact PM2.5 levels, particularly in the most deprived areas of Enfield. Of the 78 locations assessed, only 4 will benefit, while 56, including 14 schools, will experience moderate adverse impacts. EnCaf - APWG criticizes Policy ENV1: Environmental Protection for failing to address the increase in PM2.5 or propose mitigation measures, despite PM2.5 being a recognized harmful pollutant. Additionally, they criticise Policy SC1: Improving Health and Wellbeing, and consider it does not account for the disproportionate impacts on Enfield's deprived areas. EnCaf - APWG proposes that Policy ENV1 be revised to specifically reference PM2.5 as a pollutant requiring special attention and monitoring, include steps to reduce these emissions, and incorporate the Air Quality Positive Guidance for all site allocations. They also suggest that Policy SC1 be updated to include the AQA findings and outline specific measures to protect communities in deprived areas. Furthermore, EnCaf - APWG recommends that special attention be given to improving air quality in the placemaking areas for Edmonton Green (PL3), Angel Edmonton (PL4), and Meridian Water (PL5), as these areas are located in the most deprived parts of Enfield and are near major traffic routes and industrial installations. | Enfield Council acknowledges the concerns raised by EnCaf regarding air quality and the impact of proposed developments on PM2.5 and NO2 concentrations. However, the Council's Environmental Protection Policy (ENV1), as outlined in the Enfield Local Plan and supported by evidence from the Integrated Impact Assessment (IIA), provides a comprehensive framework for addressing air quality issues across the borough.<br><br>Addressing PM2.5 and Other Pollutants: The Environmental Protection Policy prioritizes reducing pollution levels and safeguarding air quality, aligning with both national and London-wide standards. The IIA identifies measures aimed at reducing PM2.5 concentrations, including the adoption of sustainable development practices and increased reliance on low-emission technologies. The Council is committed to adopting Air Quality Positive principles, which are incorporated into the planning framework to mitigate air quality impacts at every stage of site development, particularly in vulnerable areas like Edmonton Green and Meridian Water.<br><br>Focus on Deprived Areas: The IIA and policy ENV1 recognize that deprived areas of the borough are disproportionately impacted by air pollution. Specific measures are included to address these challenges, such as improving green infrastructure, increasing access to sustainable transport options, and implementing mitigation strategies for developments in these areas. The Council has also emphasized the need to work closely with developers to reduce emissions through the use of green | No | 02043 | Enfield Climate Action Forum - Air Pollution Working Group (EnCaf - APWG) |

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| | | walls, green roofs, and other sustainable design measures, particularly in high-traffic and industrial zones.<br><br>Holistic Approach to Health and Wellbeing: Enfield's policies already integrate health and air quality considerations within the broader context of community wellbeing. Policy SC1: Improving Health and Wellbeing includes provisions for reducing health disparities linked to environmental factors. The Council's ongoing efforts include increasing public awareness, encouraging active travel, and enhancing green spaces to mitigate pollution and improve overall air quality, as highlighted in the IIA.<br><br>Site-Specific Measures: For site allocations like Edmonton Green, Angel Edmonton, and Meridian Water, the Council has proposed specific interventions aimed at reducing air pollution. These areas will benefit from enhanced monitoring, implementation of low-emission zones, and the development of active travel infrastructure that minimizes reliance on motor vehicles, thus directly addressing the air quality issues identified in these high-risk locations.<br><br>In conclusion, the Council's approach is robust and legally compliant, with a clear commitment to reducing air pollution, especially in deprived areas, while supporting sustainable development. The IIA and Policy ENV1 outline clear, actionable measures that address both PM2.5 and NO2 impacts in a targeted and effective manner, ensuring the health and wellbeing of all residents. | | | |
| **SP SC1: Improving health and wellbeing of Enfield's diverse communities** | Enfield Climate Action Forum - Air Pollution Working Group's (EnCaf - APWG) response to the Air Quality Assessment (AQA) highlights concerns that the developments proposed in the Draft Local Plan will mostly negatively impact PM2.5 levels, particularly in the most deprived areas of Enfield. Of the 78 locations assessed, only 4 will benefit, while 56, including 14 schools, will experience moderate adverse impacts. EnCaf - APWG criticizes Policy ENV1: Environmental Protection for failing to address the increase in PM2.5 or propose mitigation measures, despite PM2.5 being a recognized harmful pollutant. Additionally, they criticise Policy SC1: Improving Health and Wellbeing, and consider it does not account for the disproportionate impacts on Enfield's deprived areas. EnCaf - APWG proposes that Policy ENV1 be revised to specifically reference PM2.5 as a pollutant requiring special attention and monitoring, include steps to reduce these emissions, and incorporate the Air Quality Positive Guidance for all site allocations. They also suggest that Policy SC1 be updated to include the AQA findings and outline specific measures to protect communities in deprived areas. Furthermore, EnCaf - APWG recommends that special attention be given to improving air quality in the placemaking areas for Edmonton Green (PL3), Angel Edmonton (PL4), and Meridian Water (PL5), as these areas are located in the most deprived parts of Enfield and are near major traffic routes and industrial installations. | Enfield Council acknowledges the concerns raised by EnCaf regarding air quality and the impact of proposed developments on PM2.5 and NO2 concentrations. However, the Council's Environmental Protection Policy (ENV1), as outlined in the Enfield Local Plan and supported by evidence from the Integrated Impact Assessment (IIA), provides a comprehensive framework for addressing air quality issues across the borough.<br><br>Addressing PM2.5 and Other Pollutants: The Environmental Protection Policy prioritizes reducing pollution levels and safeguarding air quality, aligning with both national and London-wide standards. The IIA identifies measures aimed at reducing PM2.5 concentrations, including the adoption of sustainable development practices and increased reliance on low-emission technologies. The Council is committed to adopting Air Quality Positive principles, which are incorporated into the planning framework to mitigate air quality impacts at every stage of site development, particularly in vulnerable areas like Edmonton Green and Meridian Water.<br><br>Focus on Deprived Areas: The IIA and policy ENV1 recognize that deprived areas of the borough are disproportionately impacted by air pollution. Specific measures are included to address these challenges, such as improving green infrastructure, increasing access to sustainable transport options, and implementing mitigation strategies for developments in these areas. The Council has also emphasized the need to work closely with developers to reduce emissions through the use of green walls, green roofs, and other sustainable design measures, particularly in high-traffic and industrial zones.<br><br>Holistic Approach to Health and Wellbeing: Enfield's policies already integrate health and air quality considerations within the broader context of community wellbeing. Policy SC1: Improving Health and Wellbeing includes provisions for reducing health disparities linked to environmental factors. The Council's ongoing efforts include increasing public awareness, encouraging active travel, and enhancing green spaces to mitigate pollution and improve overall air quality, as highlighted in the IIA.<br><br>Site-Specific Measures: For site allocations like Edmonton Green, Angel Edmonton, and Meridian Water, the Council has proposed specific interventions | No | 02043 | Enfield Climate Action Forum - Air Pollution Working Group (EnCaf - APWG) |

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| | | aimed at reducing air pollution. These areas will benefit from enhanced monitoring, implementation of low-emission zones, and the development of active travel infrastructure that minimizes reliance on motor vehicles, thus directly addressing the air quality issues identified in these high-risk locations.<br><br>In conclusion, the Council's approach is robust and legally compliant, with a clear commitment to reducing air pollution, especially in deprived areas, while supporting sustainable development. The IIA and Policy ENV1 outline clear, actionable measures that address both PM2.5 and NO2 impacts in a targeted and effective manner, ensuring the health and wellbeing of all residents. | | | |
| **SP SC2: Protecting and enhancing social and community infrastructure** | The Metropolitan Police Service Design Out Crime Team's resposne to policy SC2 aims to ensure the timely provision of new or enhanced community facilities to meet the evolving needs of the borough's growing population. These facilities should preferably be located in defined town centers or accessible areas like public transport corridors. Community provisions under this policy include education and training, health and leisure facilities, children's play spaces, places of worship, burial spaces, libraries, pubs, cultural uses, and facilities related to community safety and security, such as police and emergency services. | Comments noted. The policy aims to ensure the timely provision of new or enhanced community facilities to meet the borough's evolving needs, ideally located in town centers or accessible areas. Community provisions include education, health, leisure, children's play spaces, places of worship, burial spaces, libraries, pubs, cultural uses, and facilities related to community safety and security. All applications will be considered on a case-by-case basis and judged on their own merits. | No | 01721 | Metropolitan Police Service Design out Crime Team |
| **SP SC2: Protecting and enhancing social and community infrastructure** | The NHS London Healthy Urban Development Unit supports the policy's aim to protect community buildings and encourages the use of the NHS HUDU model. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP SC2: Protecting and enhancing social and community infrastructure** | Sport England is unclear if all criteria for the loss of facilities must be satisfied or just one element. They object if only one element is required, as only criterion 1.b aligns with NPPF paragraph 103 and Sport England policy. NPPF paragraph 103 does accept the loss of sports facilities if replaced by another facility that offers greater benefits. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP SC2: Protecting and enhancing social and community infrastructure** | Sport England considers that Criterion 1.b of SC2 should specify that replacement provision must be of at least equivalent quantity, quality, and accessibility to align with NPPF paragraph 103 and Sport England policy. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP SC2: Protecting and enhancing social and community infrastructure** | Sport England considers that new sports facilities are not always needed in designated centres; for instance, new playing fields or artificial grass pitches should be based on local needs, which may not align with designated centres. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP SC2: Protecting and enhancing social and community infrastructure** | Sport England recognises that policy SC2 does not mention that new facilities should meet identified current or future local needs. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |

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| **SP SC2: Protecting and enhancing social and community infrastructure** | Sport England notes that additional homes increase demand for sports and recreation facilities and questions why the policy does not seek contributions towards improving existing or new facilities. While outdoor play space contributions are mentioned under exceptional circumstances, there is a need for specific references to open space, sport, and recreation provisions to address the increased demand from new developments. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP SC2: Protecting and enhancing social and community infrastructure** | Sport England notes paragraph 5.7 does not list sport and recreation facilities as community facilities, although paragraph 5.12 references compliance with Sport England guidance for new educational facilities, which is welcomed. Sport England suggests adding sport and recreation facilities to the list of community provisions in paragraph 5.7. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP SC2: Protecting and enhancing social and community infrastructure** | Places for London broadly support Policy SC2. However, they strongly suggest that Sections 4 and 5 are amended to state that developer contributions 'may be sought' rather than 'will besought', since these requirements will depend on the specific considerations set out within each policy relating to both healthcare and education. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **SP SC2: Protecting and enhancing social and community infrastructure** | NHS Property Services (NHSPS) supports the provision of quality community facilities but finds Draft Policy SC2 to be overly restrictive and not positively prepared. NHSPS highlights the potential negative impact on the NHS's ability to deliver essential services if healthcare facilities are rigidly classified as community assets. They emphasize the need for flexibility in managing their estate, including the sale of redundant properties to fund new or improved services. Requiring exploration of alternative community uses for surplus NHS sites can cause unjustified delays in reinvestment. NHSPS requests modifications to Part 1 of Draft Policy SC2 to exclude sites declared surplus as part of public service transformation plans from needing to meet all the policy's criteria, ensuring the policy is both positively prepared and effective. | The Council acknowledges the importance of flexibility in managing NHS estate to ensure the delivery of essential healthcare services. The proposed policy aims to balance the protection of community facilities with the need for efficient healthcare service delivery. The Council understands the NHS's requirement to dispose of surplus properties to reinvest in modern healthcare facilities. However, it is crucial to maintain a robust framework to ensure that any loss of community facilities, including healthcare, is justified and that alternative provisions are considered. The policy's criteria are designed to ensure thorough consideration before the loss of any community facility. The Council appreciate NHSPS's feedback and are willing to engage in further discussions to refine the policy. The Council is open to working collaboratively through a Statement of Common Ground to ensure that the policy supports the NHS's operational needs while safeguarding community interests. The approach is justified as it aligns with the broader strategic objectives set out in the Council's evidence base, ensuring a balanced and sustainable approach to community facility management. The Council will consider the NHS's suggestions and look forward to working together to find a mutually agreeable solution. | No | 01985 | NHS Property Services |
| **Chapter 6: Blue and Green Enfield** | | | | | |
| **SP BG1: Enfield's blue and green infrastructure network** | Natural England welcomes and supports the inclusion of blue and green infrastructure policies (Policy BG1 and BG13) in the Local Plan. | Support noted. | No | 01743 | Natural England |
| **SP BG1: Enfield's blue and green infrastructure network** | HCC's response highlights the impending implementation of Schedule 3 of the Flood and Water Management Act 2010, anticipated for late 2024. This will require Enfield Council to establish a SuDS Approval Body (SAB) to ensure appropriate use of SuDS in all new developments and potentially adopt SuDS serving more than one property. HCC advises Enfield LPA to consult the LLFA team for further advice on Schedule 3 and its implications. Although DEFRA has yet to confirm specific expectations, the legislation set out in Schedule 3 is likely to apply. | Comments noted. | No | 01755 | Hertfordshire County Council as Lead Local Flood Authority (LLFA) |
| **SP BG1: Enfield's blue** | The NHS London Healthy Urban Development Unit welcomes the aspiration for Enfield to become London's greenest borough and supports the enhancement of | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board | No | 01872 | NHS London Healthy Urban |

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| **and green infrastructure network** | the Blue and Green Infrastructure network, particularly improvements to walking and cycling links and the promotion of food growing. | (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | Development Unit |
| **SP BG1: Enfield's blue and green infrastructure network** | TfL welcomes proposals for public realm improvements along main routes (A10, A406, A101) and at key stations and town centre gateways, as well as new crossings/bridges over the A10, A406, and Lee Valley line to address east-west severance. Early engagement with relevant infrastructure providers, including TfL, is essential. Additionally, confirming support for the Healthy Streets Approach would ensure consistency with other sections of the Local Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP BG1: Enfield's blue and green infrastructure network** | Sport England supports policy BG1: Blue and Green Infrastructure Network, as parks and open spaces often include playing fields, and sport is frequently undertaken on blue infrastructure. They recommend adding the word "Protect" to paragraph 'h.' to ensure the protection of open space and outdoor sport facilities, not just their creation. Sport England emphasizes that private playing fields should receive similar protection as public ones, noting that NPPF paragraph 103 does not differentiate between public and private facilities. Additionally, they support Strategic Policy SP BG1 1.h, which seeks to create and increase publicly accessible open spaces and outdoor sports facilities in areas with the highest deficiencies, and highlight that the Playing Pitch Strategy (PPS) would help determine the necessary facilities and locations. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP BG1: Enfield's blue and green infrastructure network** | London borough of Waltham Forest (LBWF) generally supports the policies in the Blue and Green Enfield chapter, which outlines policies to enhance the natural environment and promote green infrastructure. They praise Enfield's ambitious targets for biodiversity net gain and urban greening, which exceed the national standards and may inspire similar actions in their borough. They also welcome the initiatives to create green links across Enfield and connect to Banbury Reservoir, as well as the measures to protect the Epping Forest SAC and mitigate its impacts. They reaffirm their commitment to work with Enfield and other authorities on harmonising approaches to HRA requirements. | The supportive feedback on Enfield's Blue and Green Enfield chapter is welcomed. The Council is pleased to receive their praise for its ambitious targets for biodiversity net gain and urban greening. The Council appreciate their positive response to its initiatives for creating green links and protecting the Epping Forest SAC. Their reaffirmed commitment to work collaboratively on harmonising HRA approaches is invaluable. The Council look forward to continued partnership to enhance our natural environment and promote green infrastructure across our boroughs. | No | 02006 | London borough of Waltham Forest |
| **SP BG1: Enfield's blue and green infrastructure network** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman's property within the development boundary, the reduction of green open space, and the conflict with Enfield's Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP |
| **SP BG1: Enfield's blue and green infrastructure network** | ADL supports Draft Policy BG1's aim to integrate green and blue infrastructure in development proposals. However, they suggest that the policy should include flexibility to account for instances where embedding such infrastructure is not practical or feasible due to physical constraints or viability issues. ADL proposes amending the policy to: "Proposals will be expected, where possible, to contribute to the creation of a more integrated, multi-functional, and accessible blue and green infrastructure network and address deficiencies in quantity, quality, and access across the Borough." | Comments noted. The council appreciate ADL's support for Draft Policy BG1's aim to integrate green and blue infrastructure in development proposals. Our commitment to creating a multi-functional, accessible green and blue infrastructure network is based on the evidence provided in the Blue and Green Enfield study and the Viability Update. The council acknowledge the need for flexibility in the policy to account for physical constraints or viability issues. The council will consider amending the policy to ensure its approach ensures that development is practical while striving to enhance Enfield's environmental quality. Further engagement and a statement of common ground will be pursued to refine these objectives. | No | 01682 | Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). |
| **SP BG1: Enfield's blue and green** | CPRE London recommends that the Local Plan should propose reallocating at least 25% of Enfield's kerbside space for green and active travel infrastructure. They highlight that much kerbside space is currently used cheaply for private car parking but is increasingly needed for purposes such as bus and cycle lanes, cycle | Comments noted. The Council appreciates CPRE London's recommendation for reallocating kerbside space to support green and active travel infrastructure. Enfield's Blue and Green Strategy already promotes the transformation of urban spaces to meet environmental and health goals. By integrating features such as | No | 01726 | CPRE London |

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| **infrastructure network** | parking, shared mobility parking, delivery hubs, rain gardens, tree planting, EV charging points, parklets, pocket parks, and play areas. This reallocation would support environmental, transport, and health goals, transforming kerbside space into valuable public areas. | bus and cycle lanes, shared mobility hubs, rain gardens, and EV charging points, we can enhance public spaces and encourage sustainable transport. These measures align with our broader objectives of improving urban livability and environmental resilience. | | | |
| **SP BG1: Enfield's blue and green infrastructure network** | CPRE London proposes designating space for woodland creation as part of Enfield's land-use planning. They suggest supporting a route for tree cover connectivity around the capital, involving various treescape initiatives such as native woodland regeneration, orchards, intensified street tree planting, and garden streets. This initiative, outlined in their proposed "M25 of trees" map, aims to address climate change and biodiversity strengthening. The plan has support from environmental organizations and the More Natural Capital Coalition. CPRE has identified several sites in Enfield for tree planting and woodland creation, detailed in Annex 1 of their submission. | Comments noted. The Council welcomes CPRE London's proposal for designating spaces for woodland creation and supports the "M25 of trees" initiative. This aligns with Enfield's Blue and Green Strategy, which aims to enhance green infrastructure and biodiversity. We recognize the importance of native woodland regeneration, intensified street tree planting, and other treescape initiatives in addressing climate change and strengthening biodiversity. The sites identified by CPRE for tree planting and woodland creation will be considered in our land-use planning efforts to create a greener, more sustainable Enfield. | No | 01726 | CPRE London |
| **SP BG1: Enfield's blue and green infrastructure network** | London Wildlife Trust welcome and support the policies in this chapter BG1-13, with a few comments. | Support noted. | No | 01974 | London Wildlife Trust |
| **SP BG1: Enfield's blue and green infrastructure network** | London Wildlife Trust recommends adding to Strategic Policy BG4: Biodiversity Net Gain, Landscape Restoration, and Offsetting under part 1 that all development proposals should follow the mitigation hierarchy (avoid, reduce [or minimise], mitigate, and compensate). Ensuring consistency with the definition provided in paragraph 6.26 is crucial. | Support noted. | No | 01974 | London Wildlife Trust |
| **SP BG1: Enfield's blue and green infrastructure network** | The Canal & River Trust notes that the RLN is not always clearly referenced. For the avoidance of doubt, the Trust suggest that Para 6.4 is updated as follows (additional text underlined):<br>'blue-green network extends from the River Lee and River Lee Navigation,' In addition, within Figure 6.1 the RLN and the adjacent reservoirs are washed over with the same blue layer which prevents these being clearly identified as 2no. separate waterbodies. The map should be updated accordingly. | The Council appreciate the Canal & River Trust's (CRT) feedback and will update Para 6.4 to read: "blue-green network extends from the River Lee and River Lee Navigation," ensuring clear reference to the RLN. Additionally, the council will revise Figure 6.1 to distinctly identify the RLN and adjacent reservoirs as separate water bodies, rather than washing them over with the same blue layer. This will enhance clarity and avoid any confusion regarding these important water features. | No | 02007 | Canal & River Trust |
| **SP BG1: Enfield's blue and green infrastructure network** | The Canal & River Trust notes that Part 3 of this policy requires all residential development to implement measures to avoid and mitigate potential adverse impacts on the SAC's integrity. However, part 3i) includes the phrase "and other non C3 uses," which needs further clarification. This phrase appears to encompass all other forms of development, causing confusion about the specific requirements under Policy BG3. | The Council appreciate the feedback regarding Policy BG3, part 3i). To address the confusion, we will provide clearer guidelines on what constitutes "other non C3 uses." The intention is to ensure that all forms of development, not just residential (C3), incorporate measures to avoid and mitigate potential adverse impacts on the Special Area of Conservation (SAC). For detailed guidance and measures, please refer to the Enfield Recreation Mitigation Strategy. This will ensure comprehensive protection and clarity in implementing the policy. | No | 02007 | Canal & River Trust |
| **SP BG1: Enfield's blue and green infrastructure network** | The Enfield Society indicates that the policy is not legally compliant or sound. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP BG2: Protecting nature conservation sites** | Natural England welcomes Policy BG2, which outlines the protection hierarchy for designated sites and ensures development does not adversely affect SPAs and SACs unless it meets regulatory requirements. They appreciate the requirement for a Habitats Regulations Appropriate Assessment for developments likely to impact SPAs, SACs, or Ramsar sites. Additionally, they support the recognition | The positive feedback is welcomed. The Council appreciate their recognition of Enfield's commitment to enhancing biodiversity, addressing the climate crisis, and striving towards becoming a carbon-neutral Borough. As we continue to develop and implement these initiatives, Natural England's support and expertise are | No | 01743 | Natural England |

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| | that new developments could impact the Lee Valley SPA and Ramsar site, as well as Wormley Hoddesdonpark Woods (SAC), due to air pollution and increased recreational pressure, and endorse the Local Plan's commitment to resisting developments that would significantly harm these sites. | invaluable. We look forward to working collaboratively to ensure our policies effectively contribute to a greener, more sustainable Enfield. | | | |
| **SP BG2: Protecting nature conservation sites** | HCC supports the recognition of the Site of Metropolitan Importance along the River Lea corridor, emphasising its importance as a continuous river corridor habitat extending into Broxbourne. | Support noted. | No | 01755 | Hertfordshire County Council - Ecology |
| **SP BG2: Protecting nature conservation sites** | The Enfield Society's concerns about Policy BG2 highlight inconsistencies between the policy's aim to protect nature conservation sites and the proposed developments that would harm unique habitats. They point out that developments at Crews Hill Golf Course SINC and Glasgow Stud SINC would damage unique acid grassland habitats. Additionally, the development at 'Chase Park' would negatively impact the Vicarage Farm and Rifles Site SINC through trampling, road incursions, and playing pitches. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP BG3: Protecting Epping Forest Special Area of Conservation** | The London Borough of Redbridge recommends that the Enfield Local Plan's supporting text clarify that the 6.2km radius for the Epping Forest SAC 'Zone of Influence' is subject to review based on future Epping Forest Visitor Surveys. Additionally, they suggest that the appropriate Habitats Regulation Assessment (HRA) mitigation contributions for SAMMs and SANGs should also be subject to review and updated accordingly. | Comments noted. The London Borough of Enfield acknowledges the London Borough of Redbridge's recommendations regarding the 6.2km radius for the Epping Forest SAC 'Zone of Influence' and the review of HRA mitigation contributions. The Council agree to clarify that these measures are subject to review based on future Epping Forest Visitor Surveys and to amend Policy BG3 accordingly. This clarification will be included in the Statement of Common Ground. The Council looks forward to continuing to work with LBR to ensure mutual understanding and agreement on these matters. | Yes | 01603 | London Borough of Redbridge |
| **SP BG3: Protecting Epping Forest Special Area of Conservation** | The London Borough of Redbridge does not consider the plan to be unsound but suggests the following change for the Epping Forest SAC 'Zone of Influence,' the supporting text of paragraph 6.17 should clarify that the 6.2km radius is subject to review based on future Epping Forest Visitor Surveys. Additionally, the Habitats Regulation Assessment (HRA) mitigation contributions for SAMMs and SANGs should also be reviewed and updated accordingly. | Comments noted. The London Borough of Enfield appreciates the London Borough of Redbridge's suggestions regarding the Epping Forest SAC 'Zone of Influence.' Clarification will be included in the Statement of Common Ground. The Council is happy to work with Redbridge to clarify these points further and ensure mutual understanding and agreement on these matters. This will help in maintaining a flexible and adaptive approach based on future visitor surveys and updates to HRA mitigation contributions for SAMMs and SANGs. | Yes | 01603 | London Borough of Redbridge |
| **SP BG3: Protecting Epping Forest Special Area of Conservation** | Natural England welcomes Policy BG3's inclusion of the Epping Forest Strategic Solution, addressing residential development impacts within 6.2km of the SAC. They acknowledge Enfield Council's involvement in the Recreational Mitigation Strategy, requiring perpetual delivery of measures with Natural England's agreement. They support the commitment to 80 years of maintenance and recommend ensuring a Habitats Regulations Assessment for developments affecting European Sites. They also seek clarification on mitigating air pollution impacts on designated sites beyond existing policies. | Comments noted. The Council acknowledges Natural England's comments on Policy BG3 and will prepare a statement of common ground with Natural England to address these concerns. | Yes | 01743 | Natural England |
| **SP BG3: Protecting Epping Forest Special Area of Conservation** | Vistry Group supports measures to protect Epping Forest but seeks clarification on point 4 of the policy. They request a definition of "larger" schemes and whether this requirement applies to all such schemes in the Borough or only those beyond the 6.2km Zone of Influence. Understanding these details would help developers estimate S106 contributions and assess the initial viability of their projects. | Whilst it is recognised that this creates a degree of uncertainty, this wording was requested by Natural England to ensure that the precautional principal has been addressed. Therefore no change is required. | Yes | 01897 | Vistry Group |
| **SP BG3: Protecting Epping** | The Home Builders Federation (HBF) argues that Part 4 of the policy is unsound and unjustified. It states that applicants of 'larger' schemes outside the Epping Forest Zone of Influence may need to secure mitigation measures, which is | This wording was agreed with Natural England at their suggestion and is required to ensure that the precautionary approach is considered. An amendment could be considered to define larger schemes subject to agreement with Natural England. | Yes | 01851 | Home Builders Federation |

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| **Forest Special Area of Conservation** | unnecessary as Natural England has defined the zone as 6.2km around Epping Forest SAC. Extending the requirement beyond this zone is unwarranted and effectively expands it to the whole borough. Additionally, the policy lacks clarity, failing to define what constitutes a 'larger' scheme and using ambiguous language, which does not meet the NPPF's requirement for clear and unambiguous policies. | Further work is progressing on a statement of common ground with Natural England which could address such an amendment. | | | |
| **SP BG3: Protecting Epping Forest Special Area of Conservation** | The Canal & River Trust notes that Policy BG3 – Protecting Epping Forest Special Area of Conservation: Part 3 of this policy refers to the need for all residential development to put in place adequate measures to avoid and mitigate potential adverse impacts on the integrity of the SAC. However, within part 3i) there is reference to ‘and other non C3 uses’. Further clarity on the meaning of this should be provided as currently this would appear to encompass all other forms of development and results in some confusion as to what the requirements would be under Policy BG3 | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |
| **SP BG3: Protecting Epping Forest Special Area of Conservation** | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) objects to Policy BG3 in the Enfield Local Plan, arguing it inadequately protects the Epping Forest Special Area of Conservation (SAC) from the impacts of the PL5 Meridian Water development. They highlight that the proposed quantum and quality of open space for PL5 is insufficient, potentially causing harm to the SAC. The Habitats Regulations Assessment (HRA) is critiqued for being based on outdated housing numbers and lacking thorough analysis of the open space provisions. The Group notes significant deficits in local green spaces and suggests that the proposed mitigation measures are inadequate. They argue that the current strategy, including enhancements at Kenninghall Open Space, will not effectively offset the recreational impacts on Epping Forest. Furthermore, the ELP's compliance with relevant legislation and the London Plan is questioned, and they conclude that Policy BG3 and PL5 fail the soundness test as they are not consistent with national policies aimed at protecting the natural environment. | Comments noted. The council acknowledges the EnCaf Land Use Working Group's concerns about the Epping Forest SAC and the PL5 Meridian Water development. The Council commits to updating the Habitats Regulations Assessment with current data, ensuring sufficient open space in PL5, and refining mitigation measures, including enhancements at Kenninghall Open Space. The Council confirms that the Enfield Local Plan complies with national policies, legilsation, and the London Plan, and we pledge ongoing dialogue with stakeholders to protect the SAC while balancing development needs. For detailed evidence, please refer to the Recreational Mitigation Strategy which sets out the mitigation agreed with Natural England. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Natural England supports Enfield's commitment to a minimum of 20% biodiversity net gain for new developments and Policy BG4's focus on prioritizing on-site net gain, which enhances local biodiversity and community access to nature. They suggest that mitigation and compensation for statutory designated sites or irreplaceable habitats should be handled separately from biodiversity net gain, ensuring it is additional to required habitat creation or enhancement. Biodiversity net gain should apply to all habitat features within a development unless regulations provide exemptions. | Comments noted. The council acknowledges Natural England's recommendations and will be preparing a Statement of Common Ground to address these concerns and ensure alignment on biodiversity net gain and other related policies. | Yes | 01743 | Natural England |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | The Environment Agency supports Policy BG4 – Protecting Nature and is pleased with the inclusion of a 20% biodiversity net gain requirement. They strongly recommend that the policy highlights the need for applicants to consider the watercourse module of the statutory biodiversity metric for all applications within 10 meters of watercourses, 5 meters of ditches, and for culverts running through a site’s red-line boundary. | The Council welcomes the Environment Agency's support for Policy SE8 – Protection and Improvement of Watercourses. We will consider incorporating further detail in the supporting text to emphasize the importance of watercourses for water quality, habitat availability, and ecological connectivity. Additionally, we will review paragraph 1.a. to ensure that the 8-meter setback requirement is clearly reiterated or appropriately cross-referenced to Policy SE7 for consistency. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | No | 01926 | Environment Agency |
| **SP BG4: Biodiversity net gain, landscape** | The London Gardens Trust appreciates Policy BG4's focus on protecting ecological features and achieving biodiversity net gain through landscape restoration and offsetting works. However, they recommend rewording the policy to explicitly require that any restoration and offsetting within or affecting historic landscapes listed on the Historic England Register of Parks and Gardens must | Comments noted. The Council understands LGT's recommendation to ensure that landscape restoration and offsetting works within or affecting historic landscapes listed on the Historic England Register of Parks and Gardens preserve their unique design heritage. The Council will work with our stakeholders to consider rewording the policy to include comprehensive consultation with statutory consultees and | No | 02083 | London Gardens Trust |

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| **restoration and offsetting** | preserve their unique design heritage. This includes comprehensive consultation with statutory consultees and local amenity groups to ensure that biodiversity efforts do not compromise the historical integrity and aesthetic value of these heritage sites. | local amenity groups. This will help ensure that restoration efforts enhance both biodiversity and the historical integrity of these important heritage sites. | | | |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman's property within the development boundary, the reduction of green open space, and the conflict with Enfield's Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Warmerdam & Co (Crews Hill) Ltd supports the principle of Biodiversity Net Gain (BNG) but raises concerns regarding its application in the Draft Enfield Local Plan (ELP). They point out that the '2023 Whole Plan – Viability Update' by HDH Planning & Development used a 10% BNG figure in development appraisals, rather than the 20% required by Policy CR11. They argue that either Policy CR11 should be adjusted to reflect a 10% BNG, or the appraisals should be recalculated with the 20% BNG figure. Additionally, they note that Policy BG4 also references both 10% and 20% BNG figures, causing further inconsistency. Warmerden & Co strongly supports releasing Crews Hill from the Green Belt to develop a sustainable community but emphasizes the importance of ensuring that the plan remains viable and deliverable throughout the plan period, in line with the National Planning Policy Framework (NPPF) requirements. | Comments noted. The policy for a 20% BNG is informed by the unique local circumstances and strategic environmental goals outlined in the Blue and Green Enfield evidence base. The higher percentage is aimed at significantly enhancing biodiversity across the borough, aligning with Enfield's broader sustainability and environmental enhancement objectives. While the Environment Act sets a minimum of 10%, local authorities can require higher gains if justified by local conditions and strategic priorities. The Council appreciate their input regarding site allocation SA RUR.07. The policy aims to enhance public accessibility and the quality of open spaces, which is crucial for supporting community well-being and biodiversity. As indicated in our Blue and Green Enfield strategy, these improvements will be determined through detailed planning applications and development management processes, ensuring that the enhancements are practical and aligned with local needs. | No | 01730 | Warmerdam & Co (Crews Hill) Ltd |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | McCarthy and Stone's response highlights concerns about Policy BG4, which requires at least 20% Biodiversity Net Gain (BNG). They argue that this exceeds the 10% requirement set out in the Environment Act 2021 and does not meet the tests in paragraph 57 of the NPPF. The recent Planning Policy Guidance on BNG (paragraph: 006 Reference ID: 74-006-20240214) advises against requiring more than the statutory 10% unless justified by local need, opportunities, and viability impacts, which McCarthy and Stone believe the Council has not demonstrated. They suggest that the Council adhere to the 10% BNG requirement to ensure it is fairly and reasonably related to the development scale and kind. Additionally, they recommend the Council reconsider the additional wording in Policy BG4 to align with the updated government guidance and statutory instruments, using similar terminology to ensure clarity and consistency with NPPF para 16d. | Comments noted. The Council maintains that the 20% Biodiversity Net Gain (BNG) target is justified and necessary to meet local environmental needs and support our sustainability goals. This higher target aligns with the evidence and strategic priorities outlined in the Spatial Strategy and Overall Approach Topic Paper, the Enfield Recreation Mitigation Strategy, and the Viability Update, demonstrating that a 20% BNG is both feasible and beneficial for the borough's long-term sustainability. However, the council acknowledge the need for policy clarity and will review the terminology to ensure it aligns with national guidance and statutory instruments, making the policy unambiguous as per NPPF para 16d. The council appreciate their input and look forward to continued collaboration to achieve Enfield's sustainable development objectives. | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | The Diocese of London notes that the Infrastructure Delivery Plan (IDP) is currently pending information regarding green infrastructure. They encourage the publication of this information and believe that their site is suitable for providing additional off-site Biodiversity Net Gain (BNG) provision. | The Council welcomes the Diocese's comments regarding the Infrastructure Delivery Plan (IDP). The Council appreciate the Diocese's support for the IDP findings and their suggestion for the publication of green infrastructure information. The Council recognizes the importance of providing clear targets for renewable infrastructure and BNG. As the IDP is a living document, the Council will continue to update it with the necessary information and targets to ensure it meets the borough's sustainability goals. The Council also acknowledge the Diocese's suggestion regarding the suitability of your site for additional off-site BNG provision and will consider this in our planning processes. | No | 01744 | Diocese of London |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Tottenham Hotspur FC's response suggests that to align with the Environment Act, policies BG4 and BG7 should set a minimum Biodiversity Net Gain (BNG) of 10%. They propose that the public accessibility of the site allocation SA RUR.07 should aim to improve both quantitatively and qualitatively, with the exact area to be determined through planning applications. They recommend modifying Policy BG7 to exclude the Women and Girls' Training Centre from the restoration area, ensuring the plan is sound and achievable. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |

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| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Tottenham Hotspur FC's response suggests that to align with the Environment Act, policies BG4 and BG7 should set a minimum Biodiversity Net Gain (BNG) of 10%. They propose that the public accessibility of the site allocation SA RUR.07 should aim to improve both quantitatively and qualitatively, with the exact area to be determined through planning applications. They recommend modifying Policy BG7 to exclude the Women and Girls' Training Centre from the restoration area, ensuring the plan is sound and achievable. | Comments noted and the feedback on the Local Plan policies BG4 and BG7 are welcomed. The Council recognizes Tottenham Hotspur FC's concerns regarding the BNG requirement. The policy for a 20% BNG is informed by the unique local circumstances and strategic environmental goals outlined in the Blue and Green Enfield evidence base. The higher percentage is aimed at significantly enhancing biodiversity across the borough, aligning with Enfield's broader sustainability and environmental enhancement objectives. While the Environment Act sets a minimum of 10%, local authorities can require higher gains if justified by local conditions and strategic priorities. The Council appreciate their input regarding site allocation SA RUR.07. The policy aims to enhance public accessibility and the quality of open spaces, which is crucial for supporting community well-being and biodiversity. As indicated in our Blue and Green Enfield strategy, these improvements will be determined through detailed planning applications and development management processes, ensuring that the enhancements are practical and aligned with local needs. The Council will review Tottenham Hotspur FC's suggestion to modify Policy BG7 to ensure it clearly articulates the objectives of improving public access and land quality in a way that supports both professional sports facilities and broader community use. This review will be guided by the evidence in our Blue and Green Enfield strategy and the Viability Assessment to ensure feasibility and effectiveness. The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Tottenham Hotspur FC's response suggests that to align with the Environment Act, policies BG4 and BG7 should set a minimum Biodiversity Net Gain (BNG) of 10%. They propose that the public accessibility of the site allocation SA RUR.07 should aim to improve both quantitatively and qualitatively, with the exact area to be determined through planning applications. They recommend modifying Policy BG7 to exclude the Women and Girls' Training Centre from the restoration area, ensuring the plan is sound and achievable. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Tottenham Hotspur FC's response suggests that to align with the Environment Act, policies BG4 and BG7 should set a minimum Biodiversity Net Gain (BNG) of 10%. They propose that the public accessibility of the site allocation SA RUR.07 should aim to improve both quantitatively and qualitatively, with the exact area to be determined through planning applications. They recommend modifying Policy BG7 to exclude the Women and Girls' Training Centre from the restoration area, ensuring the plan is sound and achievable. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Form received asking the council to refer to the separate representation documents. | Received with thanks. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Tottenham Hotspur FC's response suggests that to align with the Environment Act, policies BG4 and BG7 should set a minimum Biodiversity Net Gain (BNG) of 10%. They propose that the public accessibility of the site allocation SA RUR.07 should aim to improve both quantitatively and qualitatively, with the exact area to be determined through planning applications. They recommend modifying Policy BG7 to exclude the Women and Girls' Training Centre from the restoration area, ensuring the plan is sound and achievable. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Tottenham Hotspur FC's response suggests that to align with the Environment Act, policies BG4 and BG7 should set a minimum Biodiversity Net Gain (BNG) of 10%. They propose that the public accessibility of the site allocation SA RUR.07 should aim to improve both quantitatively and qualitatively, with the exact area to be determined through planning applications. They recommend modifying Policy BG7 | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |

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| | to exclude the Women and Girls' Training Centre from the restoration area, ensuring the plan is sound and achievable. | | | | |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Landvest Crews Hill Ltd argues the draft Local Plan's policy requirement for a 20% biodiversity net gain (BNG) exceeds the statutory minimum of 10% as established by Schedule 7A of the Town and Country Planning Act 1990 (amended by the Environment Act 2021). According to the Planning Practice Guidance (PPG), any higher percentage than the statutory 10% must be justified with evidence on local need, opportunities, and impacts on development viability. Paragraph 6.26 of the draft Local Plan cites the authority's ambitious nature recovery plans, recognized by DEFRA, as justification for the 20% BNG target. However, this justification is deemed insufficient as it may impact the viability of site allocations and other developments, particularly given the proposed 50% affordable housing target for Crews Hill. Additionally, the Council's evidence base lacks adequate support for a 20% BNG requirement, and the Biodiversity Action Plan Review (April 2021) suggests aligning BNG policies with national and London-wide standards. Therefore, it is requested that the requirement be revised to a minimum of 10% to align with current legislation and ensure practical implementation. | Landvest Crews Hill Ltd's concerns about the 20% Biodiversity Net Gain (BNG) requirement are noted. The Council justifies this higher target through its Nature Recovery Plans, which are recognised by DEFRA, and align with Enfield's ambitious environmental goals. While the statutory minimum under the Environment Act 2021 is 10%, the Enfield Viability Update demonstrates that this target can be achieved without undermining the financial feasibility of developments, including affordable housing in areas like Crews Hill. However, the Council acknowledges the importance of flexibility and will assess the 20% BNG target on a site-by-site basis to ensure it does not compromise viability, balancing biodiversity enhancement with development needs. | No | 01894 | Landvest Crews Hill Ltd |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Landvest Crews Hill Ltd requests that the 20% BNG requirement be revised to the statutory minimum of 10%, citing concerns about development viability and alignment with national legislation. | The Viability Update confirms that the 50% affordable housing target is viable across a range of developments, but the Council remains open to site-specific viability testing where justified. Regarding biodiversity net gain (BNG), while the Council has set an ambitious 20% BNG target, it recognizes that national policy requires only 10%, and flexibility can be applied based on local site conditions, ensuring the balance between environmental sustainability and development viability. | No | 01894 | Landvest Crews Hill Ltd |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | CCLA Investment Management does not support the 20% Biodiversity Net Gain (BNG) requirement above the national minimum, citing a lack of clear justification. They note that the Planning Practice Guidance (PPG) advises against exceeding the 10% BNG set by the Environment Act unless adequately justified by local need, opportunities, and viability. In its current form, the policy does not comply with PPG guidance or NPPF paragraphs 35(b) and 35(d). | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Vistry Group supports the aims of Biodiversity Net Gain (BNG) and the national mandatory 10% net gain requirement. They aim to exceed this where viable and site conditions allow. However, they request that the draft policy's 20% net gain target be expressed as an aspiration rather than a requirement. They emphasize the need for policy flexibility to accommodate site-specific constraints and viability considerations. | The 20% BNG requirement has been tested Enfield Viability Update. The Viability Update demonstrates that higher BNG targets are feasible and necessary to achieve long-term sustainability goals. This approach ensures Enfield's biodiversity is protected and enhanced, aligning with local priorities and addressing environmental challenges effectively. The Council will continue to engage with Vistry and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Prologis argues that Policy BG4's requirement for a 20% Biodiversity Net Gain (BNG) is inconsistent with national requirements, which set a statutory objective of 10% BNG. They reference the Government's Planning Practice Guidance, stating higher percentages should not be imposed without justification. Prologis believes the 20% requirement is not justified by proportionate evidence and recommends deleting Policy BG4 to align with national policy. They also suggest amending Policy BG9 to ensure flexible application of requirements related to watercourse setbacks and deculverting to avoid prejudicing key development sites. | The 20% BNG requirement has been tested Enfield Viability Update. Thee Viability Update demonstrates that higher BNG targets are feasible and necessary to achieve long-term sustainability goals. This approach ensures Enfield's biodiversity is protected and enhanced, aligning with local priorities and addressing environmental challenges effectively. The Council will continue to engage with Prologis and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01905 | Prologis for Ravenside Retail Park |
| **SP BG4: Biodiversity** | SEGRO objects to Policy BG4, which requires a minimum 20% biodiversity net gain (BNG), as this exceeds the national requirement of 10% without proper | The 20% BNG requirement has been tested Enfield Viability Update. The Viability Update demonstrates that higher BNG targets are feasible and necessary to | Yes | 01922 | SEGRO |

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| **net gain, landscape restoration and offsetting** | justification. They argue that this discrepancy with the Planning Practice Guidance (PPG) could hinder plan deliverability. SEGRO suggests amending the policy to align with the national 10% BNG requirement, ensuring it is feasible and supported by evidence. They also emphasize the need for adequate off-site compensation if the 20% target cannot be met on-site. | achieve long-term sustainability goals. This approach ensures Enfield's biodiversity is protected and enhanced, aligning with local priorities and addressing environmental challenges effectively. The Council will continue to engage with SEGRO and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | | | |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Henry Boot Developments (HBD) argues that Part 2 of the policy is unsound because it requires a 20% improvement in Biodiversity Net Gain (BNG), which is contrary to national policy advising a minimum of 10% improvement. They assert that this higher requirement is unjustified and would likely pose significant challenges for many industrial schemes. | The 20% BNG requirement is justified as per the Enfield Recreation Mitigation Strategy and the Enfield Viability Update. The Recreation Mitigation Strategy outlines the need for enhanced green spaces to mitigate recreational impacts on sensitive areas. Meanwhile, the Viability Update demonstrates that higher BNG targets are feasible and necessary to achieve long-term sustainability goals. This approach ensures Enfield's biodiversity is protected and enhanced, aligning with local priorities and addressing environmental challenges effectively. The Council will continue to engage with Henry Boot Developments and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01943 | Henry Boot Developments (HBD) |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Henry Boot Development argues that part 2 of the policy is unsound because it requires a 20% Biodiversity Net Gain (BNG), which is contrary to national policy that requires a minimum of 10%. They assert that a 20% requirement is likely to be challenging for many industrial schemes and is therefore unjustified. The national policy advises a 10% improvement, and the higher local requirement may impose undue difficulties on industrial developments. | The 20% BNG requirement is justified as per the Enfield Recreation Mitigation Strategy and the Enfield Viability Update. The Recreation Mitigation Strategy outlines the need for enhanced green spaces to mitigate recreational impacts on sensitive areas. Meanwhile, the Viability Update demonstrates that higher BNG targets are feasible and necessary to achieve long-term sustainability goals. This approach ensures Enfield's biodiversity is protected and enhanced, aligning with local priorities and addressing environmental challenges effectively. The Council will continue to engage with Henry Boot Developments and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01943 | Henry Boot Developments (HBD) |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Tottenham Hotspur FC's concerns highlight the importance of clarity in the Local Plan, particularly regarding the spatial strategy outlined in Policy SS1. They note that while key development sites are identified, the policy does not explicitly mention the allocation for high-class professional sports facilities at Whitewebbs Lane. Given its significance, they propose that the Local Plan should specifically reference this allocation to ensure the Plan's effectiveness and clarity. They suggest incorporating wording that recognizes Whitewebbs Lane as a vital location for professional sports facilities to enhance the health, social, and economic well-being of Enfield residents. | Comments noted. The Council is committed to working collaboratively to ensure that these minor adjustments are addressed efficiently without undermining the overall soundness of the Plan. | No | 02089 | Tottenham Hotspur Football Co Ltd |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Fairview state Policy also outlines a list of key infrastructure priorities from developments which include, affordable housing, and specialised housing need. Fairview aims to deliver affordable housing and potentially specialised housing need on-site. The draft policy also outlines BNG as another priority for infrastructure. As previously mentioned, the successful delivery of 50% affordable housing on-site in addition to 20% BNG will make the scheme less viable. They therefore suggest that the NPPF minimum requirement of 10% BNG is clearly stated within this policy to act as a buffer between the boroughs target 20% BNG value. | Fairview's concerns about the 20% Biodiversity Net Gain (BNG) requirement are noted. The Council justifies this higher target through its Nature Recovery Plans, which are recognised by DEFRA, and align with Enfield's ambitious environmental goals. While the statutory minimum under the Environment Act 2021 is 10%, the Enfield Viability Update demonstrates that this target can be achieved without undermining the financial feasibility of developments, including affordable housing in areas like Chase Park. However, the Council acknowledges the importance of flexibility and will assess the 20% BNG target on a site-by-site basis to ensure it does not compromise viability, balancing biodiversity enhancement with development needs. | No | 01746 | Fairview New Homes |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | The Home Builders Federation (HBF) argues that Part 2 of the policy, which requires a 20% improvement in biodiversity net gain (BNG), is unsound, unjustified, and contrary to national policy that advises a minimum of 10%. They highlight that the viability assessment was based on a 10% BNG assumption, and increasing this requirement to 20% would challenge many residential schemes, particularly in medium and low-value areas. These areas, including the strategic allocations associated with Meridian Water, have historically faced development challenges. HBF contends that it is unsound for the Council to exceed the national BNG policy, given these viability issues. | Comments noted. The council's approach is justified. The Viability Assessment supports the requirement for a 20% Biodiversity Net Gain (BNG) confirming that it is feasible and aligns with our broader sustainability goals. | Yes | 01851 | Home Builders Federation |
| **SP BG4: Biodiversity** | London Wildlife Trust welcome and support the policies in this chapter BG1-13, with a few comments. | Support noted. | No | 01974 | London Wildlife Trust |

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| **net gain, landscape restoration and offsetting** | | | | | |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | While London Wildlife Trust welcomes the strategic approach to tall buildings in the borough, there are concerns that their potential impacts on biodiversity are not addressed. These impacts include bird strikes, effects on bats and nocturnal insects, shading, lighting, wind tunneling, facade treatments, and location. The Lee Valley is a significant migration flyway for birds. Biodiversity Net Gain is unlikely to address these issues. London Wildlife Trust recommends adding a reference in the policy or supporting paragraphs, suggesting that buildings should be located and designed to mitigate adverse impacts on biodiversity, including facade treatments, lighting plans, and measures to reduce wind tunneling effects. Although lighting is mentioned in Policy ENV1, it is too generic. | Support noted. | No | 01974 | London Wildlife Trust |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | The Canal & River Trust notes the Council aims to achieve a minimum of 20% net gain, including on-site habitat creation. However, unless a viability assessment specifically considering the impacts on operational development for maintaining the RLN has been undertaken, there should be provisions for site-by-site consideration regarding requirements above 10% for operational development. | The 20% BNG requirement has been tested Enfield Viability Update. The Viability Update demonstrates that higher BNG targets are feasible and necessary to achieve long-term sustainability goals. This approach ensures Enfield's biodiversity is protected and enhanced, aligning with local priorities and addressing environmental challenges effectively. The Council will continue to engage with CRT and stakeholders to prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 02007 | Canal & River Trust |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | The Barnet and Enfield Swifts Group recommends that Strategic Policy BG4 include the installation of swift bricks in all new-build developments, including extensions. They emphasize that swift bricks are preferable to external boxes due to their durability, no maintenance requirements, better thermal regulation, and aesthetic integration, following best-practice guidance such as BS 42021 or CIEEM. | Comments noted. The Council considers that a modification is not necessary to meet the tests of soundness. However, we acknowledge the value of swift bricks for small bird species and will suggest including additional explanatory text as a minor modification to provide clarity on this matter. This approach will help ensure the policy supports best-practice guidance such as BS 42021 or CIEEM, promoting the installation of swift bricks in new developments for their long-term benefits and aesthetic integration. | No | 01785 | Barnet and Enfield Swifts Group |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | The Enfield Society's concerns regarding biodiversity net gain focus on the inappropriateness of biodiversity offsetting for the proposed developments at Chase Park and Crews Hill. Specifically, they highlight that: 1) Crews Hill Golf Course: The area includes a designated Site of Importance for Nature Conservation (SINC) characterized by rare and unique acid grassland habitat, which cannot be re-created elsewhere. 2) Chase Park: The Vicarage Farm and Rifle Site SINC forms part of a network of habitats that support a diverse range of fauna. This network connects through grasslands to the Metropolitan SINC within Trent Park, forming a strategic ecological network. The Society emphasizes that these areas should be protected and enhanced as part of local wildlife-rich habitats and wider ecological networks, as mandated by paragraph 185 of the National Planning Policy Framework (NPPF). Biodiversity offsetting is deemed inappropriate for these established ecological networks. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | The Enfield Society's concerns regarding the policy on Biodiversity Net Gain, Landscape Restoration, and Offsetting highlight that it seeks to justify harm to designated SINCs at Vicarage Farm, Crews Hill Golf Course, and Glasgow Stud. They argue these sites are part of a fragile network of linked habitats protected by paragraph 185 of the NPPF and should not be subject to offsetting. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |

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| **SP BG4: Biodiversity net gain, landscape restoration and offsetting** | Swifts Local Network: Swifts & Planning Group proposes an amendment to the policy to include the installation of swift bricks, which serve as universal nest bricks for small bird species, in all new-build developments, including extensions. This installation should follow best-practice guidance, such as BS 42021 or CIEEM, which mandates at least one swift brick per home on average for new build developments. | The Council consider that a modification is not necessary to meet the tests of soundness but further explanatory text may provide clarity on this matter and will suggest it as a minor modification. | No | 01883 | Swifts Local Network: Swifts & Planning Group |
| **SP BG5: Green Belt and Metropolitan Open Land** | The Lee Valley Regional Park Authority (LVRPA) seeks a minor correction to the explanatory text under Policy BG5 Green Belt and Metropolitan Open Land. Paragraph 6.30 incorrectly references the Lee Valley 'Country' Park instead of the Lee Valley Regional Park. Additionally, LVRPA clarifies that none of the Regional Park within Enfield is designated as Metropolitan Open Land (MOL). This correction ensures accurate representation of the park's designation and boundaries. | Comments noted. The detailed feedback is welcomed. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | No | 01918 | Lee Valley Regional Park Authority |
| **SP BG5: Green Belt and Metropolitan Open Land** | London Gardens Trust appreciates the aim of Policy BG5 to protect Enfield's Green Belt and Metropolitan Open Land from inappropriate development. However, they suggest explicitly including protections for historic landscapes, such as those on Historic England's Register of Parks and Gardens, Enfield's local list of heritage green spaces, and the Enfield Chase Heritage Area AOSC. This would ensure that development does not compromise the integrity of these culturally and historically significant sites.<br>LGT recommend including a requirement for a comprehensive consultation process with statutory consultees and local amenity groups for development proposals affecting historic parks and gardens like Whitewebbs Park and Forty Hall. | Comments noted. The Council understands LGT's recommendation to ensure that landscape restoration and offsetting works within or affecting historic landscapes listed on the Historic England Register of Parks and Gardens preserve their unique design heritage. The Council will work with our stakeholders to consider rewording the policy to include comprehensive consultation with statutory consultees and local amenity groups. This will help ensure that restoration efforts enhance both biodiversity and the historical integrity of these important heritage sites. | No | 02083 | London Gardens Trust |
| **SP BG5: Green Belt and Metropolitan Open Land** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman's property within the development boundary, the reduction of green open space, and the conflict with Enfield's Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |
| **SP BG5: Green Belt and Metropolitan Open Land** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman's property within the development boundary, the reduction of green open space, and the conflict with Enfield's Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |
| **SP BG5: Green Belt and Metropolitan Open Land** | D&J London Property Ltd does not consider the Plan meets the test of soundness for Policy BG5. and there are inconsistencies in reference to Green Belt and MOL together, creating the impression only parts of the policy apply equally to both designations and the policy should acknowledge the potential for the redevleopment of brownfield sites in MOL.<br><br>The modifications proposed to paragraph 2 and paragraph 6.30 of Policy BG5 aim to give equal weight to how Green Belt and MOL is treated with in the Enfield Local Plan. | The Enfield Local Plan is both sound and legally compliant, having been developed based on up-to-date evidence contained in the council's planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. Regulation 18 representations and the Hadley Wood Neighbourhood Plan have been considered. The selection of Green Belt sites is backed by comprehensive evaluations, and brownfield alternatives have been proactively explored. | No | 01703 | D&J London Property Ltd |

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| **SP BG5: Green Belt and Metropolitan Open Land** | The Enfield Society's concerns about Green Belt and Metropolitan Open Land (MOL) include the need for paragraph 6.30 to reference the specific historic landscape of Old Park, now comprising the Town Park, Cheyne Walk Open Space, Bush Hill Park Golf Course, and Enfield Golf Course. They emphasize the importance of protecting even inaccessible MOL and highlight that Green Belt land was purchased by Middlesex and London County Councils for strategic planning purposes to remain undeveloped for public benefit, forming part of the historic landscape of Enfield Chase. Additionally, they note that footnotes referencing specific NPPF paragraphs are outdated and should be deleted. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP BG5: Green Belt and Metropolitan Open Land** | The Forty Hill and Bulls Cross Study Group recommends clarifying Paragraph 2 of BG5 to better define "not inappropriate" development in the Green Belt. They emphasize that both the London Plan and NPPF stress protecting the Green Belt from inappropriate development. | Comments noted. Policies have been prepared in accordance with the NPPF. | No | 01879 | Forty Hill and Bulls Cross Study Group |
| **SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land** | London borough of Waltham Forest (LBWF) considers adding "appropriate parking provision that seeks to minimise car parking" to ensure active travel and modal shift are prioritised. | The suggestion to add "appropriate parking provision that seeks to minimise car parking" to ensure active travel and modal shift are prioritised is welcomed. The Council appreciates their commitment to promoting sustainable transport. The Council will consider incorporating this suggestion into our policies to better support active travel and modal shift. | Yes | 02006 | London borough of Waltham Forest |
| **SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land** | London Gardens Trust appreciates the aim of Policy BG6 to prevent inappropriate development in the Green Belt and Metropolitan Open Land, ensuring development is sympathetic to these areas' openness and character. They recommend rewording the policy to provide strict protection for listed parks and gardens from future development. Additionally, they propose that any development affecting historic landscapes should undergo a comprehensive consultation process with statutory consultees and local amenity groups to preserve the historical integrity and significance of these landscapes and their role in the local community. | Comments noted. The Council understands LGT's recommendation to ensure that landscape restoration and offsetting works within or affecting historic landscapes listed on the Historic England Register of Parks and Gardens preserve their unique design heritage. The Council will work with our stakeholders to consider rewording the policy to include comprehensive consultation with statutory consultees and local amenity groups. This will help ensure that restoration efforts enhance both biodiversity and the historical integrity of these important heritage sites. | No | 02083 | London Gardens Trust |
| **SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman’s property within the development boundary, the reduction of green open space, and the conflict with Enfield’s Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |
| **SP BG6: Development in the open countryside and** | D&J London Property Ltd does not consider the Plan meets the test of soundness for Policy BG6 and there are inconsistencies in reference to Green Belt and MOL together, creating the impression only parts of the policy apply equally to both designations and the policy should acknowledge the potential for the redevleopment of brownfield sites in MOL. | The Enfield Local Plan is both sound and legally compliant, having been developed based on up-to-date evidence contained in the council’s planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. Regulation 18 representations have been considered. The selection | No | 01703 | D&J London Property Ltd |

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| **greenspaces including in the Green Belt and Metropolitan Open Land** | Paragraph 2 of this policy should support brownfield development in MOL explicitly.<br><br>Supporting paragraphs to Policy BG6, paragraphs 6.32 and 6.34, compound this inequitable treatment to brownfield sites in MOL as there is no mention of MOL in either paragraph.<br><br>The modifications proposed aim to give equal weight to how Green Belt and MOL is treated with in the Enfield Local Plan. | of Green Belt sites is backed by comprehensive evaluations, and brownfield alternatives have been proactively explored. | | | |
| **SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land** | D&J London Property Ltd does not consider the Plan meets the test of soundness for Policy BG6 and there are inconsistencies in reference to Green Belt and MOL together, creating the impression only parts of the policy apply equally to both designations and the policy should acknowledge the potential for the redevleopment of brownfield sites in MOL.<br><br>Paragraph 2 of this policy should support brownfield development in MOL explicitly.<br><br>Supporting paragraphs to Policy BG6, paragraphs 6.32 and 6.34, compound this inequitable treatment to brownfield sites in MOL as there is no mention of MOL in either paragraph.<br><br>The modifications proposed aim to give equal weight to how Green Belt and MOL is treated with in the Enfield Local Plan. | The Enfield Local Plan is both sound and legally compliant, having been developed based on up-to-date evidence contained in the council's planning evidence base. The plan includes extensive documentation and research to support policy decisions, ensuring a robust framework for sustainable development. Regulation 18 representations and the Hadley Wood Neighbourhood Plan have been considered. The selection of Green Belt sites is backed by comprehensive evaluations, and brownfield alternatives have been proactively explored. | No | 01703 | D&J London Property Ltd |
| **SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land** | Lansdown expresses concerns about Policy BG6 and how it addresses Green Belt development. They argue that the policy's requirements, especially regarding motor traffic and landscape character, go beyond the National Planning Policy Framework (NPPF) guidelines, which focus on the impact on openness rather than other factors like traffic. Lansdown suggests that the wording in Policy BG6 be simplified to align with the NPPF, recommending the removal of certain bullet points (2.a and 2.b) and a more straightforward reference to redevelopment in the Green Belt. | The policy's additional criteria, such as considering the impact on motor traffic and landscape character, aim to go beyond the NPPF by addressing local challenges related to sustainability, congestion, and preserving Enfield's unique character. The Blue and Green Strategy emphasises not just the protection of openness but also the enhancement of biodiversity, landscape quality, and public access to green spaces. These are vital components in achieving the Council's wider objectives of sustainable growth and environmental protection. The inclusion of motor traffic and landscape character considerations helps ensure that Green Belt redevelopment aligns with Enfield's local priorities, particularly regarding climate action and reducing car dependency. While Lansdown proposes simplifying the policy, the Council believes that the additional criteria in Policy BG6 are essential to maintaining a balanced approach to Green Belt development, addressing both national guidelines and local concerns. | No | 01998 | Landsdown |
| **SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land** | The Enfield Society's concerns about Policy BG6 highlight inconsistencies with national Green Belt policy. They argue that the policy's reference to 'development that is not inappropriate in the Green Belt' suggests a broader range of permissible developments than allowed by the NPPF. They recommend simplifying the policy to focus on aspects that differ from the NPPF and referring to the NPPF for the rest. Additionally, they express concern that Figure 6.5 does not include King's Oak Plain (SA11.2) or the acid grassland habitat of Crews Hill Golf Course within the Rural Area policy, potentially allowing for inappropriate developments by the Council as landowner. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP BG7: Strategy for enhancing the beneficial uses of Green Belt** | The Lee Valley Regional Park Authority (LVRPA) suggests that Policy BG7 requires additional detail to improve its soundness, specifically concerning the Green Belt enhancements. They propose adding explanatory text to clarify the Regional Park's role and its relationship to the Park Development Framework Area Proposals. LVRPA also recommends aligning Policy BG7 with Strategic Policy PL9 Rural Enfield, which supports sporting hubs like Pickett's Lock, and including | Comments noted. The detailed feedback on Policy BG7 and PL9 is welcomed. The Council acknowledge the need for clarity and consistency in the Local Plan regarding the Lee Valley Regional Park and its role in Enfield's Green Belt. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic | No | 01918 | Lee Valley Regional Park Authority |

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| **and the Metropolitan Open Land** | references to the Regional Park's green and blue infrastructure and strategic leisure provisions to ensure a consistent policy approach. | importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | | | |
| **SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the Metropolitan Open Land** | Tottenham Hotspur FC's response suggests that to align with the Environment Act, policies BG4 and BG7 should set a minimum Biodiversity Net Gain (BNG) of 10%. They propose that the public accessibility of the site allocation SA RUR.07 should aim to improve both quantitatively and qualitatively, with the exact area to be determined through planning applications. They recommend modifying Policy BG7 to exclude the Women and Girls' Training Centre from the restoration area, ensuring the plan is sound and achievable. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the Metropolitan Open Land** | Tottenham Hotspur FC's response suggests that to align with the Environment Act, policies BG4 and BG7 should set a minimum Biodiversity Net Gain (BNG) of 10%. They propose that the public accessibility of the site allocation SA RUR.07 should aim to improve both quantitatively and qualitatively, with the exact area to be determined through planning applications. They recommend modifying Policy BG7 to exclude the Women and Girls' Training Centre from the restoration area, ensuring the plan is sound and achievable. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
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| **SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the Metropolitan Open Land** | Tottenham Hotspur FC's response suggests that to align with the Environment Act, policies BG4 and BG7 should set a minimum Biodiversity Net Gain (BNG) of 10%. They propose that the public accessibility of the site allocation SA RUR.07 should aim to improve both quantitatively and qualitatively, with the exact area to be determined through planning applications. They recommend modifying Policy BG7 to exclude the Women and Girls' Training Centre from the restoration area, ensuring the plan is sound and achievable. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the** | Form received asking the council to refer to the separate representation documents. | Received with thanks. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |

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| **Metropolitan Open Land** | | | | | |
| **SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the Metropolitan Open Land** | Tottenham Hotspur FC's response suggests that to align with the Environment Act, policies BG4 and BG7 should set a minimum Biodiversity Net Gain (BNG) of 10%. They propose that the public accessibility of the site allocation SA RUR.07 should aim to improve both quantitatively and qualitatively, with the exact area to be determined through planning applications. They recommend modifying Policy BG7 to exclude the Women and Girls' Training Centre from the restoration area, ensuring the plan is sound and achievable. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the Metropolitan Open Land** | Tottenham Hotspur FC's response suggests that to align with the Environment Act, policies BG4 and BG7 should set a minimum Biodiversity Net Gain (BNG) of 10%. They propose that the public accessibility of the site allocation SA RUR.07 should aim to improve both quantitatively and qualitatively, with the exact area to be determined through planning applications. They recommend modifying Policy BG7 to exclude the Women and Girls' Training Centre from the restoration area, ensuring the plan is sound and achievable. | Comments noted. The Council is committed to working collaboratively to ensure that these minor adjustments are addressed efficiently without undermining the overall soundness of the Plan. | No | 02089 | Tottenham Hotspur Football Co Ltd |
| **SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the Metropolitan Open Land** | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) criticizes Policy BG7 of the Enfield Local Plan (ELP) for not being legally compliant or sound. They highlight the significant benefits of blue and green infrastructure for community health and well-being, particularly in urban areas. The ELUWG notes that Enfield's Blue and Green Strategy aims to address inequalities in access to open space, especially in the southeast, which faces deficits in green space and higher health inequalities. However, BG7 focuses enhancements in the north, neglecting the southeast and failing to address the strategy's goals or the ELP's objectives. This approach does not align with the London Plan 2021 (LP21) or national planning policy (NPPF 2023), which emphasize improving access to green spaces, especially in areas undergoing significant change. Consequently, ELUWG concludes that BG7 is not compliant with relevant legislation and does not meet the soundness tests required by the NPPF, as it fails to promote healthy and safe communities. | Comments noted. The council acknowledges the ELUWG's concerns regarding Policy BG7 and its alignment with Enfield's Blue and Green Strategy, the London Plan 2021, and the NPPF 2023. We recognize the significant benefits of blue and green infrastructure for community health and well-being, especially in urban areas with deficits in green space. While BG7 currently focuses enhancements in the north, we are committed to addressing inequalities in the southeast, ensuring balanced and equitable access to open spaces. We will review and adjust BG7 to better align with our strategy's goals, the ELP's objectives, and relevant legislation. Continuous engagement with stakeholders, including the ELUWG, is essential for promoting healthy and safe communities across Enfield. For detailed evidence, please refer to the Enfield Evidence Base. | Yes | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the Metropolitan Open Land** | The Enfield Society supports the protection of Metropolitan Open Land (MOL) in policy SS1 but raises concerns about Policy BG7, which implies MOL might be developed. They question the effectiveness and clarity of the term "Green Chain" within the Local Plan, noting that some proposed Green Links are not feasible due to long-term leases. They also point out that certain Green Chain links, such as those on golf courses, are not publicly accessible, making these aspects of the policy unjustified and ineffective. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the Metropolitan Open Land** | The Enfield Society's response to the policy on enhancing the beneficial uses of the Green Belt and Metropolitan Open Land (MOL) criticizes Policy BG7, which seeks compensation for lost Green Belt through planning measures to enhance the remaining Green Belt and MOL. They argue that this approach is not justified or sound, as it undermines the heritage value, landscape significance, and accessibility of these areas, which are protected under the London Plan. Additionally, they contend that including MOL in this policy, specifically Enfield Golf Course and Bush Hill Golf Course, is unjustified due to their historic significance and exclusion from the spatial strategy. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) | No | 01794 | Enfield Society |

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| | | are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | | | |
| **SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the Metropolitan Open Land** | The Enfield Society's concerns about Policy BG7 focus on the lack of inclusion of listed costs and schemes within the plan-wide viability testing by HDH. They argue that with the Spatial Strategy (SS1 paragraph 3) requiring 50% of all housing to be affordable, and Policy H2 (paragraph 2b) emphasizing this for Crews Hill and Chase Park, there may not be sufficient funding to cover the listed items. They suggest this lack of clarity could affect the feasibility of achieving the policy's objectives. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **DM BG8: Protecting open space** | Sport England supports policy BG8: Protecting Open Space, but emphasises that temporary facilities should be avoided on playing field land to align with national and Sport England policies. They recommend that the requirement in 1.b. to restore open space to its original purpose should also ensure restoration to its existing quality. Additionally, part 1.d. should specify that any replacement open space must be of equivalent quantity and quality and serve the same function, such as replacing a lost playing field with another playing field, not just any open space. This would ensure compliance with Sport England policy and NPPF paragraph 103. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **DM BG8: Protecting open space** | CPRE London supports the Plan's commitment to resist the loss of designated open space but suggests it should go further given increasing housing density. They recommend addressing green space needs per person to ensure sufficient amenity space, especially in high-density areas. They propose creating new green spaces in areas of deficiency, converting superfluous roads into 'streetparks,' and allocating railway sidings for nature recovery. They also advocate for policies to protect front and back garden vegetation, all mature trees, and private or semi-private amenity spaces, suggesting stronger protections like Town/Village Green status or Local Green Space designation. An example provided is the Falcon Fields Allotment, which should be designated to preserve its natural heritage and community value. | Support noted. The Council acknowledge the request for the Falcon Fields Allotments to be designated as Local Green Space. The Planning Practice Guidance states that if land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space. As this land is already protected as Metropolitan Open Land there is little additional benefit in designating the land as a Local Green Space. | No | 01726 | CPRE London |
| **DM BG8: Protecting open space** | The Enfield Society's concerns about the policy on protecting open space are that it is inconsistent with the London Plan's definition of open space, which includes both privately and publicly owned Green Belt land. The policy, as explained in Paragraph 6.39, only applies to open spaces designated on the Policies Map, conflicting with Paragraph 3's statement that open space also includes community land within housing estates and other non-designated areas. Additionally, the emphasis on the ‘multi-functional’ nature of the space in Paragraph 2a may conflict with the need to avoid harm to ecological and heritage assets in part b. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **DM BG9: Watercourses** | The Environment Agency is concerned that the Enfield Regulation 19 submission lacks a dedicated water resource and efficiency policy. While the current Core Strategy (2010) and Development Management Document (2014) contain relevant policies, the inclusion of a standalone, updated policy would be beneficial for Enfield's sustainability efforts. The EA recommends that new residential buildings achieve water efficiency levels of at least 105 litres per person per day and that commercial or major developments meet a BREEAM rating of ‘excellent’ in water efficiency. If the omission of such a policy is due to reliance on the London Plan, the EA strongly encourages a more explicit reference to Policy SI 5 in the London | The Council acknowledges the Environment Agency's concerns. We are committed to working collaboratively with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |

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| | Plan to ensure water efficiency standards are met. The EA also requests consultation when the Borough-wide Design Guide is prepared. | | | | |
| **DM BG9: Watercourses** | The Environment Agency strongly supports Policy BG9 – Watercourses, particularly the reiteration of the setback requirement in paragraph 1b, but recommends strengthening the language to specify "typically a minimum of 8 metres." Additionally, they support paragraph 1d's focus on providing ecological and biodiversity enhancements to water spaces and recommend that the supporting text further defines water spaces to include the channel, floodplain, and riparian zones. | The Council appreciates the Environment Agency's support for Policy SE8 – Protection and Improvement of Watercourses. We will review the supporting text to include further emphasis on the importance of watercourses for water quality, habitat availability, and ecological connectivity. Additionally, we will ensure that the requirement for the 8-meter setback is clearly reiterated or cross-referenced to Policy SE7 for consistency. We look forward to working collaboratively with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests, and adjust site allocations as necessary to ensure alignment with national policy. | Yes | 01926 | Environment Agency |
| **DM BG9: Watercourses** | Prologis argues that Policy BG4's requirement for a 20% Biodiversity Net Gain (BNG) is inconsistent with national requirements, which set a statutory objective of 10% BNG. They reference the Government's Planning Practice Guidance, stating higher percentages should not be imposed without justification. Prologis believes the 20% requirement is not justified by proportionate evidence and recommends deleting Policy BG4 to align with national policy. They also suggest amending Policy BG9 to ensure flexible application of requirements related to watercourse setbacks and deculverting to avoid prejudicing key development sites. | Policy BG4's requirement for a 20% Biodiversity Net Gain (BNG) is informed by Enfield's commitment to enhancing local biodiversity beyond the statutory minimum. While the national requirement is set at 10%, Enfield's unique environmental needs and objectives justify a higher target, as detailed in our evidence base. Regarding Policy BG9, the council recognizes the need for flexibility in applying requirements related to watercourse setbacks and deculverting. We will ensure these policies are implemented in a way that balances environmental objectives with the practicalities of development, avoiding undue prejudice to key development sites. | No | 01905 | Prologis for Ravenside Retail Park |
| **DM BG9: Watercourses** | SEGRO supports the principle of Policy BG9 point 3 regarding residential and commercial moorings but requests an amendment. They suggest that new residential moorings should be located away from existing Significant Industrial Locations, Locally Significant Industrial Locations, and employment uses to prevent amenity conflicts. This aligns with the 'agent of change' principle in the NPPF, which protects existing businesses from restrictions due to new nearby developments. SEGRO emphasizes the importance of ensuring new developments integrate effectively without negatively impacting existing operations. | The council appreciates SEGRO's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with SEGRO and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01922 | SEGRO |
| **DM BG9: Watercourses** | The Canal & River Trust notes that the draft Local Plan (LP) acknowledges the importance of the River Lee Navigation (RLN) in supporting sustainable communities, but its significance would be clearer with consistent references to the RLN and better representation on maps. Currently, the LP uses various terms for the RLN, creating confusion. Additionally, some sections of the navigation are obscured by administrative boundaries or other map layers. The LP should be amended to ensure clear and consistent references to the RLN in the text and on all figures and maps. | Comments noted. The Council appreciate the Canal & River Trust's feedback on the draft Local Plan (LP) and recognize the importance of the River Lee Navigation (RLN) in supporting sustainable communities. To address the concerns, the Council will ensure consistent references to the RLN throughout the text and improve its representation on maps, eliminating any ambiguity caused by varying terms or administrative boundaries. The Council is committed to working collaboratively with the CRT through a Statement of Common Ground (SoCG) to refine these elements and enhance clarity in the ELP. | No | 02007 | Canal & River Trust |
| **DM BG9: Watercourses** | The Canal & River Trust notes that Policy BG9 and the plan do not consider the delivery of new moorings, despite significant growth in the number of boats on London's waterways. The Trust's London Mooring Strategy (2018) highlights a nearly doubling of boats in seven years, with almost half used as permanent homes. The Trust seeks to work with local authorities to assess boaters' needs, as required by the Housing and Planning Act 2016, and provides data indicating a clear demand for more residential moorings.<br><br>The Trust suggests planning policies should support additional residential moorings in appropriate locations and recognize that online moorings can enhance public enjoyment and natural surveillance. They recommend amending BG9(3) to consider appropriate criteria for moorings rather than specifying their location in relation to the main channel.<br><br>The Trust also supports requiring new waterside developments to facilitate new residential moorings by providing access routes and utility connections. They emphasize the need to balance all waterway users' interests and develop waterspace strategies. Given the functional nature of waterways, the Trust calls for bespoke planning policies that address specific issues relevant to them and | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |

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| | recommends amending Policy BG9 accordingly. Figure 6.7 does not seem to be included in the document. The Trust would welcome consultation on this when available given our comments in relation to the clarity of the RLN on figures and maps within the LP. | | | | |
| **DM BG9: Watercourses** | The Canal & River Trust must be contacted in relation to any potential use of the waterway for freight and this paragraph should be amended to reflect this: *'Applicants will need to demonstrate using robust evidence that their operations will not excessively disrupt the local habitats, deterioration of water quality, stability of the waterway infrastructure or navigational safety and consultation /commercial agreements with the Canal & River Trust will be required'.* | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |
| **DM BG9: Watercourses** | The Canal & River Trust notes that this section emphasizes the need for high-quality design that responds appropriately to its surroundings, reflecting existing context and character with suitable materials. The Canal & River Trust recommends treating waterways as integral parts of a broader network and not just as backdrops. Developments should consider both water and land perspectives, ensuring the integrity of waterway structures and optimizing views, natural surveillance, and access. They should avoid exposing 'back of house' elements to the waterway and use landscaping to buffer visual impacts. These principles should be included in the Local Plan or Borough-wide Design Guide. The Trust is willing to engage further with the Council and encourages developers to have pre-application discussions. | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |
| **DM BG10: Urban greening and biophilic principles** | CCLA Investment Management recommends maintaining the exclusion of warehousing (Class B2 and B8) from Policy BG10, citing the Inspector's report on the London Plan. The report highlights the challenges and costs associated with urban greening for industrial developments, noting the feasibility issues of green roofs due to construction and maintenance costs. To ensure the policy is justified per NPPF 35(b), CCLA suggests amending the policy to exclude Class B2 and B8 and focus on commercial developments exceeding urban greening targets as per the London Plan. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **DM BG10: Urban greening and biophilic principles** | Vistry Group suggests the draft policy BG10, which requires exceeding Urban Greening Factor targets, should be applied flexibly to avoid conflicts with other policy goals and ensure viability. They also seek clarification on the principles of biophilic design mentioned in point 1 of the policy, as the draft plan currently lacks a definition, making it unclear for design teams. | We welcome Vistry Group's comments on Policy BG10. However, Enfield's adopted Blue and Green Strategy sets out the council's vision for improving Enfield's Biodiversity and there is an urgnet need to improve access to urban green space, particularly in the East of the borough where there is currently a deficiency. Biophilic design is a concept used within the building industry to increase occupant connectivity to the natural environment through the use of direct nature, indirect nature, and space and place conditions. | Yes | 01897 | Vistry Group |
| **DM BG10: Urban greening and biophilic principles** | Places for London welcome and endeavour to exceed the urban greening factor targets as outlined in Policy BGIO and as encouraged by our TfL Sustainable Development Framework; however, they strongly recommend the inclusion of a caveat stating that such targets should be achieved where viable and subject to site constraints. This is in accordance with London Plan Policy DFI, where Section D indicates that 'applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements'. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **DM BG10: Urban greening and biophilic principles** | Blackrock UK Property Fund's response highlights that the London Plan's Urban Greening targets do not apply to industrial developments for B2/B8 uses, as it is generally not feasible for these forms of development to meet the requirement, especially when the goal is to intensify employment sites. The draft policy should reflect this and not impose the Urban Greening Factor on industrial developments to remain consistent with the London Plan. Additionally, the policy's requirement for | The feedback on Draft Policy SE4 and the Urban Greening Factor is welcomed. The Council acknowledges the unique constraints and requirements of industrial developments, particularly for B2/B8 uses. The Council's approach is based on a robust evidence base, as outlined in its Blue and Green Enfield Evidence and the Enfield Viability Update. These documents provide a comprehensive understanding of how sustainable practices can be integrated into various types of | No | 01952 | Blackrock UK Property Fund |

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| | green roofs and the retention of 'healthy' trees does not account for the unique constraints of industrial development. The policy should be more flexible, allowing for the removal of lower-quality trees if it results in greater employment space or improved design through intensification. The explanatory notes should clarify that the Urban Greening Factor requirement does not apply to B2 and B8 industrial developments, aligning with Paragraph 8.5.5 of the London Plan. | development, including industrial uses, while also considering economic viability. However, the Council understand the need for flexibility to ensure that policies are both practical and conducive to the intended development outcomes. Therefore, while maintaining our commitment to sustainability and urban greening, the Council is willing to explore adjustments to the policy to better accommodate the specific needs of industrial developments. This could include clearer guidance on the applicability of the Urban Greening Factor to industrial sites and more nuanced criteria for the retention of trees. The Council is committed to working collaboratively with stakeholders like Blackrock UK Property Fund and propose entering into a Statement of Common Ground to refine the policy details. This will ensure that the Local Plan supports high-quality, sustainable industrial development while meeting the broader environmental and economic objectives of the borough. | | | |
| **DM BG10: Urban greening and biophilic principles** | While the Trust supports the principles in Policy BG10, it highlights the absence of specific provisions for wildlife species that rely on buildings for nesting or roosting, such as swifts and bats. The Trust proposes modifying BG10 to include mandatory provisions for incorporating swift bricks and bat roosts in all new buildings and major refurbishments. They suggest specific requirements, such as one swift brick or bat roost per home and clusters of bricks or roosts for larger developments. | Comments notd. While the proposal to mandate the installation of swift bricks and bat roosts in all new buildings and major refurbishments aligns with biodiversity goals, it is important to consider the wider implications of enforcing such specific provisions. Enfield's Blue and Green Strategy already supports biodiversity enhancement through broader measures like green roofs and sustainable drainage systems, which offer a wider range of ecological benefits. Mandating species-specific features could increase construction costs, particularly for smaller developments, and may not be appropriate for all types of buildings or locations. Instead of a blanket requirement, a more flexible approach would be to encourage developers to incorporate these features where feasible. This would allow for biodiversity enhancement without placing undue constraints on development, aligning with the Biodiversity Net Gain (BNG) principles under the Environment Act 2021, which promotes adaptable solutions based on the context of each site. | No | 01852 | Herts & Middlesex Wildlife Trust |
| **DM BG11: Allotments and community food production** | The NHS London Healthy Urban Development Unit supports the policy's aim to promote food growing but notes the absence of minimum targets for developers, which raises concerns about the policy's deliverability. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **DM BG11: Allotments and community food production** | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) highlights several concerns regarding Policy BG11: Allotments and Community Food Production in the Enfield Local Plan (ELP). They note that while Enfield's Blue and Green Strategy Audit indicates the Borough exceeds its allotment space targets overall, certain wards like Cockfosters and Lower Edmonton have deficiencies. The London Mayor's Food Strategy emphasizes the importance of urban food growing, aligning with LP21 Policy G8, which the ELP should conform to. Despite supporting the aims of BG11 to protect allotments, ELUWG believes the policy should also protect community food growing spaces and better plan for new allotments, especially in deficient areas. They criticize the ELP for not adequately planning for community gardens or new allotments in site allocations and for lacking evidence-based identification of areas with allotment space deficiencies. They recommend encouraging community-led food growing initiatives and addressing allotment needs in high-growth areas like Meridian Water. Additionally, they stress the need for improved monitoring metrics for allotment provision to ensure the policy's aims are met. They conclude that BG11 and the broader ELP are not compliant with national policy, as they fail to adequately promote healthy and safe communities, making the plan unsound. | Comments noted. The council acknowledges ELUWG's concerns regarding Policy BG11 and appreciate their support for the protection of allotments and agree on the importance of addressing deficiencies in specific wards like Cockfosters and Lower Edmonton. In alignment with the London Mayor's Food Strategy and LP21 Policy G8, the council will enhance BG11 to also protect community food growing spaces and plan for new allotments, particularly in high-growth areas such as Meridian Water. The council is committed to encouraging community-led food growing initiatives and will improve monitoring metrics to ensure effective policy implementation. | Yes | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **DM BG12: Burial and crematorium spaces** | The Environment Agency supports Policy BG12 – Burial and Crematorium Spaces and is pleased to see that Paragraph 6.59 refers users to the Agency's approach to groundwater protection. The Agency recommends updating this reference to include "Cemeteries and Burials: Groundwater Risk Assessments" (October 2023) and "Protecting Groundwater from Human Burials." Additionally, the Agency notes | The Council appreciates the Environment Agency's support for Policy BG12 – Burial and Crematorium Spaces. We will update Paragraph 6.59 to include references to "Cemeteries and Burials: Groundwater Risk Assessments" (October 2023) and "Protecting Groundwater from Human Burials" to ensure clarity and accuracy. We will also address the issue with footnote 36 by adding the | Yes | 01926 | Environment Agency |

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| | that footnote 36 is missing and suggests that the correct link be added or hyperlinked to ensure proper access to the guidance. | appropriate link or hyperlink to the guidance. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | | | |
| **DM BG13: Blue and green infrastructure plans** | Natural England welcomes and supports the inclusion of blue and green infrastructure policies (Policy BG1 and BG13) in the Local Plan. | Support noted. | No | 01743 | Natural England |
| **DM BG13: Blue and green infrastructure plans** | HCC does not have any fundamental concerns regarding the impact of the proposed Enfield Local Plan Reg 19 on Hertfordshire, beyond the considerations already mentioned. They hope that appropriate Green Infrastructure (GI) will be included in any major developments to help offset potential increases in local disturbance. | Comments noted. The Council is committed to incorporating robust Green Infrastructure (GI) in major developments to offset potential local disturbances. Our Blue and Green Strategy aims to enhance green spaces and biodiversity, ensuring sustainable and resilient development. The Council will address HCC's concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and continue our collaborative efforts to meet these objectives. | No | 01755 | Hertfordshire County Council - Ecology |
| **DM BG13: Blue and green infrastructure plans** | Vistry Group supports high-quality public realm development, which enhances well-being and biodiversity. However, they express concerns that the combined prescriptive policies (BG13, DE7, DE11) increase costs for developers, potentially conflicting with other objectives like affordable housing. They note that highly landscaped public realms, as required by these policies, may not be sustainable for Council maintenance teams. Vistry suggests these policies be assessed on a site-by-site basis to ensure viability for both developers and Council maintenance teams. | We welcome Vistry Group's comments on Policy BG10. However, Enfield's adopted Blue and Green Strategy sets out the council's vision for improving Enfield's Biodiversity and there is an urgnet need to improve access to urban green space, particularly in the East of the borough where there is currently a deficiency. The Council will continue to engage with Vistry and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **DM BG13: Blue and green infrastructure plans** | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) criticizes Policy BG13: Blue and Green Infrastructure Plans of the Enfield Local Plan (Reg 19) for lacking clear, specific measurable requirements essential to achieving the strategic aims of sustainable development as outlined in the NPPF 2023 and the London Plan 2021 (LP21). ELUWG recognises the importance of blue and green infrastructure for environmental sustainability, public health, and community well-being, especially in urban areas. They suggest that Design and Access Statements, and Masterplans for major sites, include integrated blue-green infrastructure plans. They recommend clarifying how to assess net loss and the area to be considered, and suggest referencing the Edmonton Vision and specifying areas with deficiencies of access to open space. Additionally, they propose including native and climate change-tolerant species in landscaping, clear maintenance roles for leaseholders, and improved monitoring metrics to measure gains and losses in blue and green infrastructure. ELUWG concludes that BG13, as it stands, does not adequately support the protection and expansion of green and blue infrastructure, making the Enfield Local Plan inconsistent with national policy and therefore unsound. | Comment noted. This change is not considered to be necessary to make the policy sound. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **DM BG13: Blue and green infrastructure plans** | The Enfield Society's concerns about the policy on Blue and Green Infrastructure Plans are that it is a Development Management policy rather than a strategic policy. They question why the Local Plan does not also include a requirement for heritage statements as a development management policy, particularly since heritage statements are a requirement in the current Enfield Development Management Document DPD. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **Chapter 7: Design and Character** | | | | | |

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| **SP DE1: Delivering a well-designed, high quality and resilient environment** | National Grid notes the increasing development pressure on sites crossed by NGET infrastructure and advocates for high standards of design and sustainable development as promoted by national planning policy. They emphasize the need for creative approaches to developing around high voltage overhead lines and other NGET assets. National Grid suggests modifying Policy DE1 to include a strand that ensures a comprehensive and coordinated approach to development, respecting existing site constraints, including utilities situated within sites. | Comments noted. The Council acknowledges the importance of considering existing utilities in development planning. Clarification will be included in the Statement of Common Ground. The Council is happy to work with National Grid to clarify these points further and ensure mutual understanding and agreement on these matters. | Yes | 01658 | National Grid |
| **SP DE1: Delivering a well-designed, high quality and resilient environment** | The Metropolitan Police Service Design Out Crime Team emphasises that all developments should create safe and secure places by adhering to Secured by Design principles. Applicants must consult with Metropolitan Police crime officers early in the planning process and detail security measures and compliance within the Design and Access Statement (DAS). The Council will involve the Metropolitan Police in all major development planning applications. In high-crime areas, Secured by Design certification may be required for planning consent. If conflicts arise between Secured by Design principles and other urban design goals, applicants must justify the compromises in their DAS. | Comments noted. The policy aims to ensure the timely provision of new or enhanced community facilities to meet the borough's evolving needs, ideally located in town centers or accessible areas. Community provisions include education, health, leisure, children's play spaces, places of worship, burial spaces, libraries, pubs, cultural uses, and facilities related to community safety and security. All applications will be considered on a case-by-case basis and judged on their own merits. | No | 01721 | Metropolitan Police Service Design out Crime Team |
| **SP DE1: Delivering a well-designed, high quality and resilient environment** | Historic England commend the Council's efforts and the positive aspects of the draft Plan, especially Policies SS2 and DE1, which aim to create well-designed, high-quality environments that respect the historic context. However, their main concern at this stage is the approach to tall buildings. Detailed comments on the policy framework and proposed Allocations are included in Appendices A and B. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SP DE1: Delivering a well-designed, high quality and resilient environment** | TfL welcomes the reference to the Healthy Streets Approach in section 7.5 but suggests that the link should direct to TfL's specific guidance for London, rather than the generic website. https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP DE1: Delivering a well-designed, high quality and resilient environment** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman's property within the development boundary, the reduction of green open space, and the conflict with Enfield's Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |
| **SP DE1: Delivering a well-designed, high quality and resilient environment** | ADL supports Draft Policy DE1's focus on delivering high-quality, design-led development. They particularly emphasise the need for a coordinated approach in traditionally uncoordinated areas like SIL. ADL suggests reinforcing the requirement for a design-led approach to ensure development aligns with area characteristics and supports suitable development levels. They propose amending the policy to ensure efficient and coherent building layouts that are safe and secure, considering industrial servicing requirements. ADL recommends the following addition: "c. built form – development must provide an efficient and coherent pattern of development where public and private spaces, including buildings, are clearly distinguished, safe, and secure through a design-led approach." | Comments noted. The council appreciate ADL's support for Draft Policy DE1's emphasis on delivering high-quality, design-led development, particularly in traditionally uncoordinated areas like SIL. The suggestions to reinforce the design-led approach align with our goals to ensure development complements area characteristics and supports appropriate development levels. In line with the evidence provided in the plan's Design and Character studies, the coincil will consider incorporating ADL's proposed addition to Policy DE1 to help maintain high standards of design while ensuring functional and secure industrial servicing. Further engagement and a statement of common ground will be pursued to refine these objectives. | No | 01682 | Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). |
| **SP DE1: Delivering a well-** | To align the Draft Local Plan more closely with national and regional policies, Goodman UK Limited suggest that Chapters 7 (Design and Character) and 9 (Economy) be modified to better support the provision of a diverse range of | Comments noted. | No | 01874 | Goodman UK Limited |

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| **designed, high quality and resilient environment** | modern, high-quality, and accessible employment premises. Written representations with detailed recommendations are included in the enclosed Regulation 19 Consultation Stage Representation Form. | | | | |
| **SP DE1: Delivering a well-designed, high quality and resilient environment** | Vistry Group prioritises high-quality and resilient design in their developments and supports the intentions of draft policy DE1, aiming to enhance various aspects of new developments. They request a clear definition of "principles of biophilic design" in policy BG10 for better guidance. Vistry also supports the "Scale of change" allocations, especially for areas like Meridian Water and North Middlesex University Hospital, but seeks definitions for all levels of change, from "transformative" to "limited," to understand their impact on future design considerations. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **SP DE1: Delivering a well-designed, high quality and resilient environment** | Places for London continue to regard innovation as significant in the delivery of infrastructure, homes and commercial floorspace while remaining sympathetic to the context and locality of well-designed places; therefore, we suggest that Enfield integrates 'innovation' as an additional characteristic as part of Policy DEi, given its importance in introducing diversity and creativity within the streetscape.<br>Figure 7.1 effectively visualises Enfield's recommended scale of change that we can expect to see over the coming years. Given that Site A of the Cockfosters allocation (SA31) is designated as an area where a 'Transformative' level of change would be appropriate, we strongly request that Site Bis also appointed the same designation as 'Transformative'. This would promote greater uniformity of delivery and provide substantial support for the development site as a whole. We also recommend the same amendment to be made to Arnos Grove Station Car Park (SA?.4), from 'Medium'to 'Transformative', given that the allocation has been identified as suitable for tall buildings. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **DM DE2: Design process and design review panel** | CCLA Investment Management highlights that Paragraph 016 of the PPG states planning performance agreements (PPAs) are voluntary between applicants and local authorities. Therefore, Policy DE2 should not require PPAs, making the policy non-compliant with NPPF paragraph 35(d). CCLA suggests deleting section 2a of DE2 to ensure compliance with national guidelines. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **DM DE2: Design process and design review panel** | Vistry Group is committed to early engagement with LB Enfield but is concerned that the draft policy requires rather than encourages pre-application consultation. They argue that making pre-application advice a condition for planning permission is problematic and that detailed pre-application discussions can slow down delivery. Vistry also contests the requirement to retain the same architect throughout the project, suggesting that developers should have the flexibility to appoint a delivery architect to ensure high-quality design is maintained during construction. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **DM DE2: Design process and design review panel** | Places for London commend Enfield's decision to subdivide the supporting text provided, and therefore provide greater clarity, on design review and retaining quality post-planning into Paragraph 7.11 and Paragraph 7.12 respectively. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |

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| **DM DE2: Design process and design review panel** | Blackrock UK Property Fund argues that requiring all planning applications to seek pre-application advice is unnecessary and burdensome. They emphasize that applications should be judged on their merits, whether or not pre-application advice has been sought. For the employment sector and other time-sensitive developments, the mandatory expectation for pre-application advice could hinder quick and flexible responses to economic needs. The policy might place undue pressure on the resources of both the Planning Authority and developers, increasing costs and timescales without adding significant value. Consequently, they suggest deleting the requirement for mandatory pre-application advice, planning performance agreements, and engagement with the Design Review Panel for all developments, as it is considered unreasonable and not conducive to efficient planning processes. | The Council acknowledges the feedback from Blackrock UK Property Fund regarding the requirement for pre-application advice and appreciates their perspective on the need for flexibility in the planning process, especially for time-sensitive employment sector developments. The Council's approach aims to ensure that developments are of high quality and align with Enfield's strategic goals and planning policies. Pre-application advice is designed to provide early feedback, identify potential issues, and streamline the planning process, ultimately leading to better outcomes for developers and the community. However, the Council recognizes the concerns about the potential burden this requirement might impose on developers and the Planning Authority's resources. As such, the Council is willing to consider a more flexible approach, particularly for straightforward applications and those where time is of the essence. The Council proposes to review the policy to potentially allow exemptions for certain types of applications where pre-application advice may not add significant value. This approach will ensure that while the benefits of pre-application engagement are maximized, the process remains efficient and responsive to the needs of the development community. The Council remains committed to working collaboratively with developers and stakeholders and welcomes the opportunity to discuss these concerns further and refine the policy through a Statement of Common Ground, ensuring that it supports both high-quality development and the practical needs of developers in Enfield. | No | 01952 | Blackrock UK Property Fund |
| **DM DE2: Design process and design review panel** | Whilst Fairview intends to work with the local community at the pre-application stage in order to shape development, we believe this policy is overly vague and should be more specific outlining the requirements for community engagement at pre-application stage. This will make the policy more effective. | Comments noted. The Council is committed to working collaboratively with stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01746 | Fairview New Homes |
| **DM DE2: Design process and design review panel** | The Home Builders Federation (HBF) argues that Part 2 of the policy is unsound as it contradicts national policy. It incorrectly implies that pre-application advice is compulsory for securing a decision. Applicants have the right to submit a planning application without seeking pre-application advice. The text should be revised to state that pre-application advice is encouraged, not required. | Comments noted. The Council consider that pre-application advice should be encouraged rather than required, to align with national policy and respect applicants' rights to submit a planning application without prior advice. | Yes | 01851 | Home Builders Federation |
| **DM DE3: Inclusive design** | The NHS London Healthy Urban Development Unit welcomes the policy supporting inclusive design in line with London Plan policy D5, as well as the requirement for submitting an Inclusive Design Statement. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **DM DE3: Inclusive design** | Savills, on behalf of Asda, generally supports the remainder of the Enfield Local Plan but recommends ensuring flexibility within detailed policies to apply them appropriately. They note that several policies, such as SE2 (Sustainable Design and Construction Statement), SE9 (use of SuDS), DE3 (creating accessible spaces), DE7 (improving public realm quality), and DE11 (landscaping schemes), apply to "all development." However, Savills argues that it may be impractical or disproportionate for minor developments to meet these requirements. They suggest amending the policy wording to include "where applicable to the type of development and appropriate to do so" to accommodate the varying nature of development proposals. | The council welcomes Asda's general support of the Enfield Local Plan. The Council appreciate their feedback on ensuring flexibility within detailed policies to apply them appropriately. The Council will consider amending the policy wording to include "where applicable to the type of development and appropriate to do so," particularly for policies SE2, SE9, DE3, DE7, and DE11. This adjustment aims to accommodate the varying nature of development proposals while maintaining the council's commitment to sustainable design and quality public spaces. This approach ensures that policies are practical and proportionate, aligning with Enfield's sustainable development goals as outlined in the Enfield Viability Update. | Yes | 01732 | Asda Stores Ltd |
| **SP DE4: Putting heritage at the centre of place making** | Historic England considers the current wording of Policy DE4 to be unsound. While they acknowledge the strategic nature of this policy and its relationship with Policy DE10, which provides further detail, the requirements of the NPPF for strategic policies on heritage (paragraph 20) extend beyond place-making alone. To align the policy more fully with these national requirements, Historic England recommend the addition of a clause specifically addressing heritage significance. They suggest the introduction of a new clause (a) to Policy DE4: "Ensure a | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |

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| | significance-based approach to the management of the historic environment, seeking to preserve or enhance the significance of both designated and non-designated heritage assets." This amendment would ensure that the policy adopts a more comprehensive approach to heritage management, addressing both designated and non-designated assets, and aligning with NPPF guidelines. | | | | |
| **SP DE4: Putting heritage at the centre of place making** | London borough of Waltham Forest (LBWF) support the approach to protecting and managing the historic built environment. | The support regarding Enfield's approach to protecting and managing the historic built environment is welcomed. The Council appreciates their recognition and endorsement of Enfield's efforts in this area. | No | 02006 | London borough of Waltham Forest |
| **SP DE4: Putting heritage at the centre of place making** | Places for London welcome the council's vision to 'work in partnership with stakeholders' when it comes to protecting and enhancing the borough's heritage throughout the placemaking process, particularly in Section 2 (el which states to 'improve access to cultural, built and Landscape heritage for the enjoyment and appreciation of everybody in Line with best practice'. However, we suggest that Enfield clarify that such improvements should be made 'where appropriate', given that the need for improvement will vary greatly between each respective heritage asset and be dependent on its use and condition. They also commend Enfield's recognition that new development should 'respond to Local context in a positive manner' and 'make a positive contribution to Local character and distinctiveness'. This demonstrates the borough's appreciation that Enfield's heritage assets are unique and that design should be contextual, and that a one size-fits-all approach is not appropriate for maintaining these individual assets sustainably. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **SP DE4: Putting heritage at the centre of place making** | Residents express concerns regarding legal compliance, specifically the clarity of the term "Heritage Asset" in Policies DE4 and DE10. While the incorporation of Historic England's 2019 recommendations is acknowledged, residents urge that the definition in the 'Acronym Buster and Glossary' explicitly include both built and buried heritage resources. For Chase Park (section PL10), residents are worried about the lack of consideration for the likely multi-period buried archaeological resources in the development area, particularly prehistoric archaeology evidenced in other parts of Enfield Chase. They recommend that the Masterplan include a comprehensive archaeological assessment based on fieldwork. Additionally, while welcoming the proposal to create a heritage park at the former Slades Hill army camp and AA gun site, they stress the necessity of full archaeological documentation and possible excavation prior to development for effective site interpretation. | Comments noted. The Council acknowledges the concerns regarding the clarity of the term "Heritage Asset" in Policies DE4 and DE10 and will amend the glossary to include both built and buried heritage resources. For Chase Park, a comprehensive archaeological assessment based on fieldwork will be required in the Masterplan to address potential multi-period archaeological resources. Additionally, full archaeological documentation and necessary excavation will be prerequisites for developing the heritage park at the former Slades Hill army camp and AA gun site, ensuring effective site interpretation. | No | 00002 | Enfield Archaeological Society |
| **SP DE4: Putting heritage at the centre of place making** | The Enfield Society's concerns regarding the policy "Putting Heritage at the Centre of Place-Making" are that it does not align with NPPF paragraph 196, which calls for a positive strategy for the conservation and enjoyment of the historic environment. They argue that developments in historic Enfield Chase, such as PL10, PL11, and SA RUR.04, would cause substantial harm to heritage assets. The Society suggests that the policy needs to emphasize the conservation of heritage assets, including historic landscapes like Enfield Chase, rather than viewing heritage merely as a tool for development. They also question why there is no requirement for heritage statements in the Local Plan, despite their inclusion in the current Enfield Development Management Document DPD and the requirement for Blue and Green Infrastructure Plans set out in Policy BG13. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **DM DE5: Strategic and important local views** | The Hadley Wood Neighbourhood Planning Forum argues that two important local views have been omitted from Table 7.1 and Figure 7.2. The first is the view from high ground on Wagon Road, which encompasses undulating farmland, historic Enfield Chase, mature Oaks, Hadley Wood, two Conservation Areas, and a clear view of central London, symbolizing the transition from Hertfordshire countryside to Greater London. They state this view would be harmed by development on site RUR.02. The second is the view from the top of Stagg Hill southwards to Hadley | Comments noted. Policy DE5 aims to balance the inclusion of diverse views with the overarching design strategy. While the views from Wagon Road and Stagg Hill are valuable, the comprehensive evidence base, particularly the design and character assessments, ensures that all essential views are considered to achieve a holistic approach to Enfield's landscape and urban design. Clarification will be included in the Statement of Common Ground. The Council is committed to ongoing dialogue to refine and enhance these considerations. | No | 01669 | Hadley Wood Neighbourhood Planning Forum |

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| | Wood and Trent Park, which features a rolling agricultural landscape and views of the City of London and Canary Wharf. This view would be negatively impacted by tall buildings near the Cockfosters ridge. They argue these views are as valuable as those included in policy DE5 and should not be excluded. | | | | |
| **DM DE5: Strategic and important local views** | The Enfield Society's concerns about the policy on strategic and important local views are that it is not justified, consistent with national policy, or in general conformity with the London Plan. They argue that the policy lacks a proper assessment of important views to inform development locations, citing that views listed in Local Plan Figure 7.2 were copied from a 2014 document with minimal updates. They assert that this policy should have involved local community and stakeholder engagement to assess the importance of views, particularly those affected by proposed developments like Chase Park and Enfield Town Conservation Area. Additionally, the Society highlights that the policy does not clarify whether any views are considered strategic as opposed to local. The ENPlan assessment commissioned by the Society further supports their concerns, noting that proposed developments could harm important views from The Ridgeway and surrounding areas. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **DM DE5: Strategic and important local views** | Friends of Whitewebbs Park are concerned about the protection of Important Local View 6 as mentioned in DE5, table 7.1. They assert that the viewpoints are confined to a specific 300-meter stretch of the publicly accessible footpath/bridleway on the south side of Whitewebbs Lane, between Dickensons Meadow and the King and Tinker pub. Views from other parts of the lane are obstructed by buildings, hedges, bunds, and woodland. They emphasize the need for unambiguous definition of these viewpoints to ensure their protection and can provide photographic evidence of at least five unobstructed viewpoints within the specified coordinates. These viewpoints are crucial as they offer the only southward views across Whitewebbs Park and parts of the Whitewebbs ward, including Clay Hill and Brigadier Hill. | Comments noted. It is essential to recognize that the Draft Local Plan's approach, as outlined in Enfield Council's Design and Character evidence base, seeks to balance development needs with the preservation of local character. The broader guidelines in DE5 ensure flexibility in planning while maintaining significant views, aligning with the principles of sustainable growth and urban development. This approach allows for careful consideration of all environmental and aesthetic factors without overly restricting development possibilities. | No | 01805 | Friends of Whitewebbs Park |
| **DM DE5: Strategic and important local views** | Friends of Whitewebbs Park are concerned about the protection of Important Local View 6 as mentioned in DE5, table 7.1. They assert that the viewpoints are confined to a specific 300-meter stretch of the publicly accessible footpath/bridleway on the south side of Whitewebbs Lane, between Dickensons Meadow and the King and Tinker pub. Views from other parts of the lane are obstructed by buildings, hedges, bunds, and woodland. They emphasize the need for unambiguous definition of these viewpoints to ensure their protection and can provide photographic evidence of at least five unobstructed viewpoints within the specified coordinates. These viewpoints are crucial as they offer the only southward views across Whitewebbs Park and parts of the Whitewebbs ward, including Clay Hill and Brigadier Hill. | Comments noted. It is essential to recognize that the Draft Local Plan's approach, as outlined in Enfield Council's Design and Character evidence base, seeks to balance development needs with the preservation of local character. The broader guidelines in DE5 ensure flexibility in planning while maintaining significant views, aligning with the principles of sustainable growth and urban development. This approach allows for careful consideration of all environmental and aesthetic factors without overly restricting development possibilities. | No | 01805 | Friends of Whitewebbs Park |
| **DM DE5: Strategic and important local views** | The Barnet Society argues that the Local Plan fails to consider the views from Monken Hadley Conservation Area adequately. They suggest modifications to include these considerations explicitly in the Plan's policies, particularly for development proposals like the Cockfosters Station Car Park. The representation questions the soundness of the Local Plan, implying that it does not fully align with national policy requirements, particularly in regard to heritage and visual impact considerations. The Society recommends adding specific language to the Local Plan to ensure that long views from Monken Hadley Conservation Area are considered in development proposals. For example, they propose modifying the language in Box Area 1.2 related to the Cockfosters Station Car Park to include this consideration. The Barnet Society expresses their views without requesting participation in the examination hearings, suggesting that the proposed changes can be incorporated into the Plan without further oral representations. Their representation emphasizes the need to strengthen the Local Plan's focus on heritage protection, particularly with regard to visual impacts on conservation areas. | Comments noted. While The Barnet Society raises valid concerns regarding the need to consider views from the Monken Hadley Conservation Area, it's important to recognize that the Enfield Local Plan already includes robust mechanisms for heritage preservation and visual impact mitigation. The Spatial Strategy and Overall Approach, along with the Site Allocation Topic Paper and Integrated Impact Assessment (IIA), demonstrate that these considerations have been factored into site allocations, including Cockfosters Station Car Park. The Plan ensures that any potential development will respect the historical and visual integrity of nearby conservation areas, in line with both national and local planning policies. Therefore, additional modifications are not needed, as the existing framework adequately protects these heritage assets. | No | 01817 | The Barnet Society |

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| **DM DE6: Tall buildings** | The GLA's response highlights that the draft ELP has multiple definitions for tall buildings across different borough areas, mostly set at 21m and above, including roof plant. The GLA calls for clarity on where measurements should start, such as from ground level or AOD. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | Yes | 00120 | Greater London Authority (GLA) |
| **DM DE6: Tall buildings** | The GLA's response notes that seven small areas in the draft ELP have different tall building definitions (30m to 36m) without explanation. The GLA requests justification for these separate definitions and an assessment of the potential harm from exceeding these heights. | Comments noted. The Council emphasizes that the methodology used in the Enfield Local Plan is thoroughly documented and supported by robust evidence, as detailed in the Character of Growth Report, section 4.03 Method. In response to GLA's concerns and to ensure transparency, Enfield will reference this section in paragraph 7.42 of the plan. This reference will provide clarity and allow stakeholders to access detailed information about the methodology used in developing the plan. | No | 00120 | Greater London Authority (GLA) |
| **DM DE6: Tall buildings** | The GLA's response acknowledges that the draft ELP identifies 58 locations suitable for tall buildings with specific height limits, complying with LP2021 Policy D9 Part B2. However, it suggests that broader area identification might be more appropriate for flexibility and to accommodate future changes, as many locations are small and adjacent. | Comments noted, however, the Council disagrees with the GLA's assertion. The areas designated for tall buildings are based on broad character areas identified in the updated Characterisation Study and analysed through the Character of Growth Study, aligning with London Plan Policy D1. These areas, suitable for change and growth, have been thoroughly evaluated using a VU City modelling exercise, with methodology developed in consultation with Historic England. Detailed information is available in the Character of Growth Appendices within the Local Plan evidence base. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **DM DE6: Tall buildings** | The GLA's response criticises the draft ELP for setting maximum building heights for site allocations, which is inconsistent with LP2021 Policy D9 that implies flexibility and a range of appropriate heights. It suggests that maximum heights should only be set where necessary, such as for strategic views or Civil Aviation Authority limits. | Comments noted. The concern revolves around the interpretation of building height, specifically whether the issue is with the height specified in the site allocation or the height itself. The specified heights in site allocations have been carefully coordinated with the tall building policy to ensure alignment and consistency. Appendix D3 of the Enfield Local Plan provides clear guidance on height interpretation, ruling out uniform height and mandating context-dependent responses tailored to each site's specific context. This approach ensures that height decisions respect local context and promote sensitive urban design principles. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **DM DE6: Tall buildings** | The GLA's response suggests that Policy DE6 should clearly state that tall buildings are only suitable in identified locations. The exceptions in Parts 5 and 6 should be removed to avoid confusion, as the planning system already permits exceptions based on Development Plan policies and material considerations. | Comments noted. On DE6 Policy and Tall Buildings Maps, the Council emphasizes that Paragraph 2.0 of Policy DE6 explicitly states that tall buildings should only be constructed in designated appropriate areas. Each tall building map includes notes highlighting that tall buildings are designated solely for the proposed areas, ensuring clarity and adherence to the policy. The policy's reference to "Unusual Height" acknowledges unique circumstances where height considerations may vary. For instance, locations like Arnos Grove and New Avenue demonstrate that topography can mitigate potential impacts on neighboring properties, recognising the importance of site-specific factors in evaluating height proposals. Part 5 of the policy recognizes the need for certain civic uses, such as hospitals or universities, to have taller structures known as marker buildings. This provision serves as an exception to the general tall building policy, offering guidance to decision-makers and ensuring clarity in urban design and townscape considerations. Part 6 clarifies the scope of the policy and its alignment with the evidence base, focusing primarily on heritage, townscape, and design considerations. While there may be a need for further technical planning policy input and review, maintaining the current policy ensures consistency until additional advice is sought. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **DM DE6: Tall buildings** | Historic England appreciates the clarity on tall building locations and heights but objects to clause 9, which implies acceptable harm to heritage assets, contradicting the NPPF and the Town and Country Planning Act 1990. This is | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common | No | 01788 | Historic England |

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| | especially concerning for conservation areas. They suggest removing references to "likely harm" and ensuring proposals meet Plan requirements. They are open to resolving issues through a Statement of Common Ground but will participate in hearing sessions if needed. Further details are in Appendix A. | ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | | | |
| **DM DE6: Tall buildings** | Historic England welcomes the extensive work that underpins Policy DE6, particularly the clarity provided on the locations and heights of tall buildings. However, they object to the wording of Clause 9, which suggests that an undefined level of harm to heritage assets could be acceptable. This is inconsistent with the NPPF, which states that heritage assets are irreplaceable and any harm requires clear and convincing justification (para 206). Furthermore, this approach conflicts with the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990, which mandates that conservation areas be preserved or enhanced. Given that some tall building locations are within or adjacent to conservation areas, embedding potential harm into policy is concerning. Historic England suggests the policy be amended to remove references to "likely harm" and instead require that tall building proposals appropriately consider their impact on heritage assets. Additionally, a caveat should be included stating that tall buildings in identified areas will only be acceptable if they meet all relevant Plan requirements, including those related to heritage. Historic England suggests modifying Figure 7.4 to reflect that tall buildings may only be appropriate where they satisfy all the Plan's requirements, particularly those safeguarding the historic environment. They are open to resolving these issues via a Statement of Common Ground but, if necessary, are prepared to participate in hearing sessions to explain and clarify their concerns. These amendments are essential to make the policy sound and ensure it aligns with both the NPPF and relevant legislation. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **DM DE6: Tall buildings** | Historic England welcomes the extensive work that underpins Policy DE6, particularly the clarity provided on the locations and heights of tall buildings. However, they object to the wording of Clause 9, which suggests that an undefined level of harm to heritage assets could be acceptable. This is inconsistent with the NPPF, which states that heritage assets are irreplaceable and any harm requires clear and convincing justification (para 206). Furthermore, this approach conflicts with the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990, which mandates that conservation areas be preserved or enhanced. Given that some tall building locations are within or adjacent to conservation areas, embedding potential harm into policy is concerning. Historic England suggests the policy be amended to remove references to "likely harm" and instead require that tall building proposals appropriately consider their impact on heritage assets. Additionally, a caveat should be included stating that tall buildings in identified areas will only be acceptable if they meet all relevant Plan requirements, including those related to heritage. Historic England suggests replacing clause 9 with: Tall building proposals must demonstrate how they have preserved and enhanced the significance of any affected heritage assets, including any contribution made by their setting. They are open to resolving these issues via a Statement of Common Ground but, if necessary, are prepared to participate in hearing sessions to explain and clarify their concerns. These amendments are essential to make the policy sound and ensure it aligns with both the NPPF and relevant legislation. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **DM DE6: Tall buildings** | Historic England welcomes the extensive work that underpins Policy DE6, particularly the clarity provided on the locations and heights of tall buildings. However, they object to the wording of Clause 9, which suggests that an undefined level of harm to heritage assets could be acceptable. This is inconsistent with the NPPF, which states that heritage assets are irreplaceable and any harm requires clear and convincing justification (para 206). Furthermore, this approach conflicts with the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990, which mandates that conservation areas be preserved or enhanced. Given that some tall building locations are within or adjacent to conservation areas, embedding potential harm into policy is concerning. Historic England suggests the policy be amended to remove references to "likely harm" and instead require that | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |

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| | tall building proposals appropriately consider their impact on heritage assets. Additionally, a caveat should be included stating that tall buildings in identified areas will only be acceptable if they meet all relevant Plan requirements, including those related to heritage. Historic England suggests deleting clause 10. They are open to resolving these issues via a Statement of Common Ground but, if necessary, are prepared to participate in hearing sessions to explain and clarify their concerns. These amendments are essential to make the policy sound and ensure it aligns with both the NPPF and relevant legislation. | | | | |
| **DM DE6: Tall buildings** | The NHS London Healthy Urban Development Unit emphasizes that tall buildings must be safely designed to protect residents and users from fire and other emergencies and to minimize the risk of suicide. They advocate for extra scrutiny at the planning stage to ensure safety considerations from design inception, including the materials and construction systems used. | Comments noted. The Council is supportive of the principle of a design-led approach to deliver optimum density on sites. Policy is helping to deliver Secured by Design in Enfield, it can greatly enhance the safety and security of those using or residing within a development and the wider environs of the local community, by using proven crime prevention measures at design, planning stage. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **DM DE6: Tall buildings** | London borough of Waltham Forest (LBWF) support the approach to tall buildings and appreciate the alignment with London Plan Policy and additional design guidance for tall buildings. | The support of Enfield's approach to tall buildings is welcomed. The Council appreciates their recognition of our alignment with London Plan Policy and the additional design guidance we have included for tall buildings. Their positive feedback is invaluable as the council strive to ensure that its development strategies promote sustainable and well-designed urban growth. | No | 02006 | London borough of Waltham Forest |
| **DM DE6: Tall buildings** | LB Barnet notes that, while the Reg 18 draft Local Plan initially identified New Southgate Opportunity Area as suitable for tall buildings (8 storeys or 26 meters or more), their position has since changed. Due to the importance of Locally Important Views and a lack of supporting evidence, New Southgate is no longer designated for tall buildings. The potential for tall buildings in New Southgate may be reconsidered during an early review of the Plan. LB Barnet anticipates a joint strategic policy and area planning framework with LB Enfield and LB Haringey for the New Southgate Opportunity Area (NSOA) to address this issue. LB Barnet emphasizes the need for ongoing cooperation with LB Enfield, particularly on site allocations and taller buildings in cross-boundary areas. | The Council acknowledges LB Barnet's revised position on the designation of tall buildings in this area and the importance of protecting Locally Important Views. We welcome the opportunity to work collaboratively with LB Barnet and LB Haringey on a joint strategic policy and area planning framework for NSOA. We are committed to maintaining a cooperative approach, particularly in cross-boundary areas, and will work with LB Barnet on a Statement of Common Ground to ensure alignment on site allocations and planning for taller buildings where appropriate. | Yes | 02091 | London borough of Barnet |
| **DM DE6: Tall buildings** | ADL supports the inclusion of Brimsdown as an area appropriate for tall buildings for industrial intensification, allowing for increased industrial floorspace on brownfield sites with minimal impact on residential areas. They acknowledge the importance of quality in delivering tall buildings per London Plan D9 but emphasize the need to balance quality with viability, especially in SIL locations. ADL proposes amending Part 9 of Policy DE6 to: “In addition to the requirements of policy D9 of the London Plan (2021 and its successors), proposals involving tall buildings should demonstrate how they will: …” to ensure that development remains feasible even in challenging market conditions. | Comments noted. The council appreciate ADL's support for the inclusion of Brimsdown as an area suitable for tall buildings to facilitate industrial intensification. The council acknowledge the importance of balancing quality with viability in delivering these developments, particularly within SIL locations. As supported by the Enfield Viability Update Planning report, the council will aim to ensure policies remain feasible under market conditions. Therefore, the council will consider ADL's suggested amendment to Part 9 of Policy DE6 to help maintain the viability and high standards of development. Further engagement and a statement of common ground will be pursued to refine these objectives. | No | 01682 | Areli Developments Ltd. (‘ADL’) on behalf of the Landowner of Stockingswater Lane (‘Landowner’). |
| **DM DE6: Tall buildings** | ARGO Real Estate Limited supports the identification of SILs, such as Eley’s Estate, as appropriate locations for tall buildings, which can enhance industrial intensification. However, they question the basis for the 36-meter height limit set for these areas and urge the Council to maintain flexibility for taller buildings where justified. ARGO highlights that multi-level industrial typologies and data centres often require heights above 36 meters for effective use of land. They recommend that the Local Plan should allow site-specific assessments to determine appropriate building heights, particularly in areas with few environmental or heritage constraints, like Eley’s Estate. Flexibility in building heights is essential to accommodate the evolving needs of modern industries and maximize land use. | Comments noted. The Council recognizes the importance of maintaining flexibility for tall buildings in Strategic Industrial Locations (SIL) to support industrial intensification and emerging data-driven and high-technology industries. We appreciate ARGO Real Estate Limited’s insights regarding the height limitations and agree that site-specific assessments may be necessary to ensure the most effective use of land. The Council is committed to collaborating with ARGO Real Estate Limited on a statement of common ground to ensure that the Draft Local Plan aligns with national and regional policies while promoting sustainable economic growth and accommodating the needs of modern industrial developments. | Yes | 01733 | ARGO Real Estate Limited |

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| **DM DE6: Tall buildings** | For Policy DE6, ARGO Real Estate Limited suggests the following modifications they consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters: Figure 7.4 also shows the indicative maximum height that is acceptable in design terms. Proposals for height above this level must therefore be justified by demonstrating that the proposed heights are acceptable in environmental, heritage and townscape terms, are necessary to meet other requirements of the development plan and/or material considerations, and are acceptable in design quality terms by meeting the criteria set out in Paragraphs [11-13] of this policy ~~with reference to the requirements of other development plan policies and/or material considerations.~~<br><br>~~6. Proposals that do not meet the above location and/or height parameters must be justified with reference to the requirements of other development plan policies and/or material considerations.~~<br>They note repetition of Para. 4. | Comments noted. The Council recognizes the importance of maintaining flexibility for tall buildings in Strategic Industrial Locations (SIL) to support industrial intensification and emerging data-driven and high-technology industries. We appreciate ARGO Real Estate Limited's insights regarding the height limitations and agree that site-specific assessments may be necessary to ensure the most effective use of land. The Council is committed to collaborating with ARGO Real Estate Limited on a statement of common ground to ensure that the Draft Local Plan aligns with national and regional policies while promoting sustainable economic growth and accommodating the needs of modern industrial developments. | Yes | 01733 | ARGO Real Estate Limited |
| **DM DE6: Tall buildings** | Turley on behalf of Royal London propose changes to the wording of this Policy to allow greater flexibility to exceed maximum heights. | Noted. The Council will enter into a Statement of Common Ground with Royal London to address these concerns and ensure alignment with strategic goals and policies. | No | 01749 | Royal London Mutual Insurance Society Limited for Southbury Leisure Park |
| **DM DE6: Tall buildings** | Winners Property Company Limited notes that Appendix D of the Draft Local Plan identifies areas potentially suitable for tall buildings (over 21m), emphasizing that inclusion in this list does not guarantee acceptability without a thorough assessment process. It underlines the necessity for proposals to meet high design standards. Nexus Planning on behalf of Miriam Investment Holdings, proposes extending the designated area for tall buildings to include Metro Point, located across Cockfosters Road from already identified sites. This prominent brownfield site, owned by our client, is immediately available for redevelopment and could help meet local housing needs. A detailed assessment has been submitted to the Council. | Comments noted. The Council acknowledge the site's potential for redevelopment and its strategic location adjacent to already identified areas. The Council will engage further by entering into a Statement of Common Ground (SoCG) with Miriam Investment Holdings to explore this proposal in detail, ensuring a thorough consideration of the site's suitability for tall buildings as part of our ongoing planning process. | No | 01764 | Winners Property Company Limited |
| **DM DE6: Tall buildings** | Joseph Homes Regeneration Limited supports Draft Policy DE6 but suggests two amendments: 1) Increase the definition of a tall building to 30 meters to align with GLA thresholds, ensuring optimal use of brownfield land and promoting regeneration. 2) Include the Commercial Road site as a 'potentially appropriate location for tall buildings' in Figure 7.4 and Appendix D, enhancing policy effectiveness and supporting mixed-use regeneration. This would align with nearby tall building zones in Edmonton Green and Angel Edmonton, fostering comprehensive redevelopment and public benefits. | Comments noted. The Council is committed to working collaboratively with Jpseph Homes Regeneration Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01875 | Joseph Homes Regeneration Limited |
| **DM DE6: Tall buildings** | Goodman UK Limited supports the Council's approach to allowing tall buildings in Strategic Industrial Locations (SIL), particularly in the Great Cambridge Road SIL, which is suitable for heights of up to 36m or 39m. They value the flexibility this offers developers for improving site usability and density. However, Goodman questions whether these height limits were established through comprehensive testing as per London Plan Policy GG2 or based on specific typologies. They believe the current evidence base is insufficiently ambitious and does not account for site-specific factors, suggesting that taller buildings, up to 54m, might be necessary for optimal industrial intensification. Goodman's feasibility studies show no significant visual impact difference between 39m and 54m buildings. They recommend increasing the height limit to 54m, allowing for flexibility and detailed | Comments noted. The Council is committed to working collaboratively with Goodman UK Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01874 | Goodman UK Limited |

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| | assessments during development, and aligning with Draft Policy DE6's flexibility provision. | | | | |
| **DM DE6: Tall buildings** | Joseph Homes Regeneration Limited supports Draft Policy DE6 but suggests two amendments: 1) Increase the definition of a tall building to 30 meters to align with GLA thresholds, ensuring optimal use of brownfield land and promoting regeneration. 2) Include the Commercial Road site as a 'potentially appropriate location for tall buildings' in Figure 7.4 and Appendix D, enhancing policy effectiveness and supporting mixed-use regeneration. This would align with nearby tall building zones in Edmonton Green and Angel Edmonton, fostering comprehensive redevelopment and public benefits. | Comments noted. The Council is committed to working collaboratively with Jpseph Homes Regeneration Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01875 | Joseph Homes Regeneration Limited |
| **DM DE6: Tall buildings** | CCLA Investment Management recommends that the supporting text of Policy DE6 recognize multi-storey industrial developments in London that are 35-40 meters tall. This acknowledgment would facilitate the construction of high-capacity, modern industrial buildings, including multi-storey warehouses, where commercially feasible. They also highlight that tall industrial buildings often have large footprints to accommodate vehicular ramps and goods lifts, and suggest the policy should consider these practical requirements. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **DM DE6: Tall buildings** | Vistry Group supports the intentions of draft policy DE6 and the importance of high-quality design for tall buildings. However, they request flexibility in point 10, which discourages single aspect homes to avoid simplified external envelopes. Vistry argues that while dual aspect homes are preferred, site constraints sometimes necessitate a simplified design to maximize density and viability. They suggest that flexibility is needed to accommodate these situations while still maintaining high design standards. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **DM DE6: Tall buildings** | IKEA's comments on Draft Policy DE6 and tall buildings highlight their support for recognizing Meridian Water as suitable for tall buildings. They emphasize the need for flexibility in applying maximum height restrictions, which should be determined at the planning application stage through a design-led approach. IKEA also notes inconsistencies and ambiguities in the Local Plan, such as cross-referencing non-existent policies and unclear "Important Local Views." They propose further engagement with Enfield Council to ensure the allocation better reflects the site's housing capacity and clarifies the tall buildings policy. | Comments noted. The Council is committed to working collaboratively with Ikea Properties Investment and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01921 | Ikea Properties Investments Ltd |
| **DM DE6: Tall buildings** | Places for London appreciates the clarity in 'Appendix D' regarding maximum height figures for each site, following issues with legibility in Figure 7.4, and the recommendation to refer to building heights in metres rather than storeys. They advocate for omitting Figure 7.3 to consolidate key information on sites suitable for tall buildings in one place. They commend Enfield for recognizing both parts of the Cockfosters Station Site as appropriate for tall buildings but question the reduction of the area's maximum height to 39m, recommending it be increased to 50m in line with the recently permitted application (ref. 21/02517/FUL). They highlight the urgent housing need and the site's suitability, suggesting the policy reflect what has been permitted. Additionally, they commend the inclusion of an 'impact on heritage assets' section in Policy DE6, aligning with Paragraph 202 of the NPPF, ensuring proposals resulting in harm have clear justification and demonstrate public benefits outweigh the harm. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **DM DE6: Tall buildings** | The Meridian Water team supports the coherent, evidence-based approach to the development of tall buildings throughout the borough in alignment with London Plan Policy D9, and the identification of areas suitable for tall buildings. However, | The Council appreciates the Meridian Water team's support for an evidence-based approach to tall buildings development in line with London Plan Policy D9, highlighting suitable areas for such structures. The proposed heights for Meridian | No | 01945 | Meridian Water (LBE) |

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| | regarding the specific heights proposed for Meridian Water (outlined in Appendix D, Area 11), they seek further dialogue with the LPA to discuss the evidence base used to determine height parameters and the assessment of potential visual and cumulative impacts. This will help determine whether Policy DE6 is justified and sound, and if modifications are necessary. | Water in Appendix D, Area 11, are based on thorough evidence and analysis, including visual and cumulative impact assessments, ensuring compatibility with the surrounding environment. This aligns with national and regional planning policies. The Council emphasizes its commitment to collaboration with stakeholders like the Meridian Water team, ensuring the Local Plan remains effective and deliverable through ongoing dialogue. A Statement of Common Ground will facilitate this cooperation, addressing concerns and ensuring the sustainable development of key areas within the borough. | | | |
| **DM DE6: Tall buildings** | BL Logistics Investment Limited (British Land) supports Draft Development Management Policy DE6 and the identification of the Southbury Area, including Heritage House, as potentially appropriate for tall buildings to enable industrial intensification. They note that Heritage House is within Area 3.4: A10 South East, where the tallest buildings (up to 48m) should be near the station and the junction (up to 42m), decreasing towards the southern extremity. For consistency, they suggest explicitly referencing the proposed building height of 39m for the Heritage House site (Policy SA2.2) to avoid confusion.<br><br>Regarding De Mandeville Retail Park, currently not identified as appropriate for tall buildings, British Land recommends that Draft Policy DE6 should recognize the potential for tall buildings there, considering the adjacent SIL intensification and prevailing building heights. They propose labeling this site and its surrounding area as 'potentially appropriate for tall buildings,' subject to appropriate testing during the planning application stage. | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **DM DE6: Tall buildings** | Draft Policy DE6 defines a tall building as any part of a building at 21 meters or above for most of the Borough. Figure 7.4 places the site in an area with locally defined building heights, but these heights have not been specified. The site is considered suitable for tall buildings and should be removed from the locally defined heights area. To ensure flexibility, it is recommended that the policy allows for tall buildings to be considered throughout the site, with precise heights determined through a design-led approach. This amendment will ensure the Local Plan is flexible and that the site is deliverable, making it effective in accordance with paragraph 35 criterion c) of the NPPF. | The Council appreciates New Ladderswood LLP's feedback on Draft Policy DE6 regarding tall buildings. The Council recognizes the importance of a flexible, design-led approach to building heights, supported by the Local Plan's evidence base on design and character. To ensure the policy remains adaptable and the site deliverable, the Council will consider revising the policy to allow for tall buildings throughout the site, with precise heights determined through a design-led approach. | No | 02090 | New Ladderswood LLP |
| **DM DE6: Tall buildings** | London Wildlife Trust's response expresses support for the overall strategic approach to tall buildings but raises concerns about the lack of attention to the potential impacts on biodiversity, such as birds, bats, and nocturnal insects. It highlights issues like shading, lighting, wind tunneling, and facade treatments, particularly noting that the Lee Valley is a key migration route for birds. The application of Biodiversity Net Gain is deemed insufficient to address these concerns. The response recommends including specific guidance in the design quality section or supporting paragraphs, advising that buildings be located and designed to mitigate adverse impacts on biodiversity, with considerations for lighting, proximity to water, and wind effects. They also note that Policy ENV1 references lighting but in a generic manner. | Concerns about biodiversity impacts, particularly on birds, bats, and nocturnal insects, are valid and align with the goals of Enfield's Blue and Green Strategy. While Policy ENV1 addresses lighting generally, we agree that more specific guidance could enhance the mitigation of biodiversity impacts from tall buildings, particularly regarding the Lee Valley migration flyway. We will consider incorporating additional guidance in the Design Quality section to ensure that building design addresses issues such as wind tunneling, facade treatments, and lighting, aligning with the broader environmental goals of the Blue and Green Strategy. | No | 01974 | London Wildlife Trust |
| **DM DE6: Tall buildings** | While London Wildlife Trust welcomes the strategic approach to tall buildings in the borough, there are concerns that their potential impacts on biodiversity are not addressed. These impacts include bird strikes, effects on bats and nocturnal insects, shading, lighting, wind tunneling, facade treatments, and location. The Lee Valley is a significant migration flyway for birds. Biodiversity Net Gain is unlikely to address these issues. London Wildlife Trust recommends adding a reference in the policy or supporting paragraphs, suggesting that buildings should be located and designed to mitigate adverse impacts on biodiversity, including facade treatments, lighting plans, and measures to reduce wind tunneling effects. Although lighting is mentioned in Policy ENV1, it is too generic. | Support noted. | No | 01974 | London Wildlife Trust |
| **DM DE6: Tall buildings** | The Canal & River Trust notes that Policy DE6 aims to establish a tall buildings strategy, identifying many areas along the River Lee Navigation (RLN) as suitable for buildings over 21m. It is crucial to avoid creating a continuous wall of tall | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of | No | 02007 | Canal & River Trust |

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| | buildings along the waterways, as this could compromise the character, appearance, and enjoyment of the waterway corridor and negatively impact biodiversity through overshadowing. The policy and supporting text should clarify that this is not a blanket approval for tall buildings in these areas, and the impact of any development will be assessed in the context of existing and approved developments. | Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **DM DE6: Tall buildings** | The Canal and Rivers Trust emphasises the need to protect the tranquil and quiet character of waterways, even in urban areas. They highlighted that developments near waterways should consider the impact on canal users and biodiversity. The Trust suggested that any changes in operating hours should not negatively affect waterway users and that development design and layout should minimize impact and include necessary mitigation measures. They recommended that these considerations be explicitly referenced in the policy and supporting text, with detailed design advice included in the forthcoming Borough-wide Design Guide. | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |
| **DM DE6: Tall buildings** | The Enfield Society has raised several concerns regarding the current policy on tall buildings, highlighting its insufficient assessment of the potential harm to heritage assets and conservation areas. They argue that such assessments should occur during plan-making rather than being deferred to the application stage. The policy's vagueness about the positioning of tall buildings is also problematic, potentially leading to more harmful developments. Specific objections are noted for areas like Cockfosters Station and Enfield Town Civic Centre, emphasizing the need for clear, consistent policy frameworks that align with the Character of Growth Study and London Plan. Additionally, the Society criticizes the policy's redundancy in repeating London Plan Policy D9, the inadequate justification for tall buildings based solely on proximity to transport, and the borough-wide definition of tall buildings as 21 meters, advocating instead for a definition aligned with local context. They call for a thorough impact assessment and revisions to the policy and maps to better protect Enfield's heritage and character. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **DM DE6: Tall buildings** | Edmonton Hundred Historical Society (EHHS) is concerned that the proposed development zones set out in DE6 will significantly impact the Enfield Town Conservation Area, which includes several Grade II and Grade II* listed buildings, such as St Andrew's Church. The proposal for Palace Gardens/Exchange and the Tesco/Sorting Office site is particularly concerning due to the planned significant building heights near the historic market town center, which could adversely affect the area's historic character and visual integrity. | Comments noted. The Council acknowledges residents' concerns about Policy DM DE6 and the proposed tall buildings at Enfield Chase Station, Palace Gardens/Exchange, Tesco's/Sorting Office, and the Civic Centre, which they fear will impact the historical market square, listed buildings like St Andrews Church, and the character of the Enfield Town Conservation Area. The council's spatial strategy supports higher-density developments in well-connected areas to optimize land use and promote sustainability, as outlined in their overall approach and site allocation topic papers. Evidence-based guidelines ensure that new developments are designed to blend with and enhance the existing urban fabric while protecting historically significant areas. The council directs taller developments away from sensitive areas, suggesting previously industrial sites like Meridian Water as more suitable alternatives to minimize negative impacts on heritage sites and conservation areas. To address these concerns, the council commits to stringent design guidelines, preserving sightlines, incorporating green spaces, and engaging with the community to balance development needs with residents' preferences. | No | 04036 | Edmonton Hundred Historical Society (EHHS) |
| **DM DE6: Tall buildings** | The Bush Hill Park Residents' Association strongly opposes the proposed zones in Policy DE6, particularly expressing concern over Area 2 in Enfield Town. They emphasize that this zone will significantly impact the Enfield Town Conservation Area, which encompasses numerous Grade II and Grade II* listed buildings, including St Andrew's Church. A primary concern is the planned significant building heights near the historic town center, specifically at the Palace Gardens/Exchange and Tescos/Sorting Office sites. Given these potential adverse effects on the town's historic character, the association is advocating for the removal of this policy from the plan. | Comments noted. The ELP Spatial Strategy and Overall Approach Topic Paper emphasizes preserving Enfield's rich historical and cultural heritage while addressing housing needs. The council is committed to ensuring that development respects and enhances the town's unique character, including its iconic structures and green spaces, vital for community well-being and social cohesion. Sustainability and natural environment protection are also prioritized, recognizing their importance for mental and physical health. | No | 04218 | Bush Hill Park Residents Association |
| **DM DE6: Tall buildings** | FLDRA acknowledges the urgent need for more housing, particularly affordable and social housing, in the borough. They argue that any tall buildings should be | Comments noted. The council's spatial strategy, as outlined in the ELP Spatial Strategy and Overall Approach Topic Paper, prioritizes sustainable development | No | 06825 | Fox Lane District |

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| | suitable for the area, especially near Conservation Areas. The DE6 Area 8 Tall Buildings Policy is expected to negatively impact the local character, which currently features a low-rise mix of buildings without tall structures. Proposed tall buildings would border the Lakes Estate Conservation Area, threatening its historic charm characterized by high-quality Edwardian homes. Additionally, the policy would affect views over Broomfield Park, a Grade II listed site designed around the Grade II* listed Broomfield House from the mid-16th century. | that respects the character of historic and green spaces. The council's design and character guidelines further emphasize the need for developments to harmonize with existing urban fabric and maintain the visual and historical integrity of sensitive areas. By adhering to these guidelines and promoting appropriately scaled buildings, the council aims to preserve the heritage and environment of the Lakes Estate and Broomfield Park while accommodating growth. | | | Residents' Association |
| **DM DE6: Tall buildings** | FLDRA acknowledges the urgent need for more housing, especially affordable and social housing, in the borough. They emphasize that any proposed tall buildings must be appropriate for the area, particularly near Conservation Areas. The DE6 Area 6 Tall Buildings Policy could have a significant impact on the Southgate area, especially concerning the Southgate Circus Conservation Area, which includes the Grade II* listed Southgate Tube Station by Charles Holden, as well as views from the historic Grade II* listed Grovelands Park and the Grade I listed Priory Hospital. | Comments noted. The Spatial Strategy and Overall Approach Topic Paper emphasizes the need for developments to be sensitive to local character and context, ensuring that new buildings do not overwhelm or detract from existing landmarks. The Site Allocation Topic Paper specifies that proposals for tall buildings must undergo thorough visual impact assessments to evaluate their effects on the surrounding area, including potential overshadowing of Southgate Town Centre and visibility from afar. Additionally, the Design and Character Evidence Base underscores the importance of preserving significant heritage sites, such as the Grade II Southgate Station. This includes designing developments to ensure that they do not obscure or overshadow historic landmarks. The plan aims to balance necessary development with the protection of Southgate's character and its historical and visual assets, ensuring that any new structures integrate harmoniously with their surroundings. | No | 06825 | Fox Lane District Residents' Association |
| **DM DE6: Tall buildings** | The Conservative Group argues that the Draft Plan’s relaxed policies on tall buildings mark a significant departure from the 2014 Development Management Document, which restricted tall buildings in sensitive areas. They believe the current policy would lead to an overproliferation of tall buildings across low-rise residential areas, negatively impacting local character, conservation areas, and heritage sites. They contend that the tall buildings proposed are not in line with the London Plan's guidelines, which emphasize that tall buildings should be located in areas where their scale and mass do not adversely affect the character of the surroundings. They suggest revisiting the policy on tall buildings (DE6) and reinstating more restrictive policies to protect the character of low-rise residential areas and conservation sites. They call for clearer policy language to reduce the discretion allowed to planning officers, ensuring that policies are applied consistently. They consider their recommendations are aimed at making the Local Plan more consistent with national and regional planning guidelines, protecting the Green Belt, and ensuring that development is sustainable and in harmony with the existing character of the borough. | The Council is confident that the Draft Plan’s policies on tall buildings are well-supported by evidence, align with both national and regional planning guidelines, and include safeguards to protect the character and heritage of Enfield. The Draft Plan's approach to tall buildings is carefully informed by a detailed understanding of local character, as outlined in the Enfield Characterisation Study, and aligns with the London Plan’s guidelines to ensure that tall buildings are located where they enhance the urban environment without compromising the character of surrounding areas. It includes rigorous provisions to protect conservation areas and heritage sites, balancing the need for housing with the preservation of Enfield’s historic assets. Additionally, the Plan’s policies are underpinned by a robust framework from the Design and Character Topic Paper, ensuring consistent application by planning officers across different developments. | No | 01670 | Cllr Rye |
| **DM DE6: Tall buildings** | The Enfield Conservative Group has raised significant objections to the proposed developments in the Crews Hill area as outlined in the Enfield Local Plan. They argue that these proposals do not meet the "exceptional circumstances" required for Green Belt release according to the National Planning Policy Framework (NPPF). The group is particularly concerned about the negative impact on the natural environment and biodiversity, the urbanization of rural settings, and the loss of recreational spaces like the Crews Hill Golf Club. They also highlight the potential harm to the Sites of Importance for Nature Conservation (SINC) in the area and express concerns about the strain on the existing transportation infrastructure, noting that the current road network and public transport services are inadequate to support the proposed developments, which would likely lead to increased car dependency. In response to these issues, the Conservative Group recommends deleting the proposed developments at Crews Hill, Chase Park, and Hadley Wood from Policy SS1, along with related site allocations and policies. They suggest reinstating more restrictive policies on tall buildings and revising Policy H4 to focus solely on brownfield sites, aligning it with the guidelines set out in the London Plan. Additionally, they advocate for clearer and more precise policy language to ensure consistent application and limit the discretionary power of planning officers. These recommendations aim to protect the Green Belt, preserve the rural character of the area, and ensure that future developments are sustainable and compliant with both local and national planning policies. | The Council acknowledges the concerns regarding Green Belt development, but the proposals in the Draft Plan are supported by a robust evidence base, including a comprehensive Green Belt Review. This review identifies areas where "exceptional circumstances" exist, justifying the release of Green Belt land to meet the borough's critical housing needs. The review considered the limited availability of brownfield sites and the need to address housing pressures in a sustainable manner. The proposed developments in Crews Hill are part of a strategic approach to distribute growth across the borough while minimizing the impact on the most sensitive areas of the Green Belt. Moreover, the Draft Plan includes detailed provisions for infrastructure improvements to support these developments, particularly in areas like Crews Hill where current public transport and road networks may be inadequate. The Plan outlines strategies to enhance transport links and reduce car dependency, aligning with both local and regional planning objectives. These measures ensure that any development in Green Belt areas will be accompanied by necessary infrastructure upgrades, making the growth sustainable and reducing potential negative impacts on the local environment and communities. | No | 01670 | Cllr Skelton |

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| **DM DE6: Tall buildings** | The Enfield Conservative Group has expressed significant concerns regarding the Draft Enfield Local Plan, particularly the proposals outlined in Policy SS1 for developments in the Cockfosters Ward. They strongly oppose the inclusion of tall buildings in the area, specifically near the Cockfosters Underground Station, arguing that such developments would disrupt the views from the Trent Park Conservation Area and fundamentally alter the suburban character of Cockfosters. The group believes that allowing buildings up to 39 meters high would transform Cockfosters from a village-like community into an environment resembling a built-up inner London town center, which they argue would be inappropriate for the area. In addition to concerns about tall buildings, the Conservative Group also objects to the proposed development on Green Belt land between Camlet Way and Crescent Way. They argue that this site is vital for preserving the village feel and maintaining the character of nearby Conservation Areas such as Hadley Wood and Monken Hadley. They recommend removing specific proposals related to Chase Park, Crews Hill, Hadley Wood, and the Cockfosters Station Car Park from Policy SS1 and revisiting the policy on tall buildings to ensure it aligns with preserving the area's low-rise character. They also suggest revising Policy H4 to focus solely on brownfield sites, in line with the London Plan's emphasis on utilizing previously developed land. | Comments noted. The Draft Local Plan was developed with a strategic and evidence-based approach, aligning with both the London Plan 2021 and the National Planning Policy Framework (NPPF). The Spatial Strategy and Overall Approach Topic Paper outlines how the Plan addresses Enfield's specific needs, including the preservation of local character while meeting housing demands. The proposals for tall buildings in Cockfosters, for instance, are carefully considered in the context of their potential impact on the area's character. The Design and Character evidence base further supports this by ensuring that any new development, including taller buildings, will be designed to complement and enhance the existing urban fabric and natural landscapes, particularly in sensitive areas like the Trent Park Conservation Area. Regarding the Green Belt, the Council conducted a rigorous Green Belt Review as part of the plan-making process. This review identified areas where "exceptional circumstances" justify the release of Green Belt land, considering the borough's pressing housing needs and the limited availability of brownfield sites. The proposed developments in Green Belt areas, including those in Cockfosters, are part of a broader strategy to distribute growth across the borough sustainably while minimizing the impact on the most sensitive areas. The Plan includes provisions for infrastructure improvements to support these developments, ensuring they are sustainable and aligned with both local and regional planning guidelines. The Council remains committed to ongoing consultation and will consider further refinements to ensure that the Plan reflects the needs and priorities of the entire community. | No | 01670 | Enfield's Conservative Group |
| **DM DE6: Tall buildings** | The Enfield Council Conservative Group expresses significant concerns about the Draft Enfield Local Plan, particularly regarding the proposed tall buildings in Enfield Town. They argue that the planned developments, which include buildings up to 42 meters in height, would disrupt the low-rise character of the Enfield Town Conservation Area and harm views of important heritage assets such as the Enfield War Memorial. The group also highlights the potential negative impact on the Enfield Town Centre Archaeological Priority Area, emphasizing that the bulk and massing of these buildings are incompatible with the existing historical and visual landscape of the area. To address these concerns, the Conservative Group recommends removing specific proposals for tall buildings at sites like Palace Gardens, Tesco's/Sorting Office, and Enfield Civic Centre to protect the character and heritage of Enfield Town. They also suggest reinstating more restrictive policies from the current Local Plan to ensure that new developments are consistent with the area's low-rise character. Additionally, they call for clearer policy language to limit the discretion of planning officers, ensuring that the protection of heritage assets and the appropriate scale of new developments are consistently prioritized in planning decisions. | Comments noted. The Draft Local Plan has been developed with a focus on balancing the need for housing and economic development with the preservation of Enfield's unique character and heritage. The Spatial Strategy and Overall Approach Topic Paper, justifies the Plan's approach to concentrate higher-density development, including taller buildings, in areas well-served by public transport and existing infrastructure, such as Enfield Town. This strategy is intended to support sustainable growth while minimizing the pressure on more sensitive areas like the Green Belt. The proposed building heights have been carefully considered to ensure they align with the broader strategic objectives of the Plan, while also contributing to the vitality and economic viability of Enfield Town as a key commercial and cultural hub. To address concerns about the impact on heritage assets and the character of the area, the Design and Character evidence base outlines stringent guidelines for the design and integration of new developments within conservation areas. These guidelines ensure that any new buildings, including taller structures, are designed to complement and enhance the existing urban fabric, preserving key views and the historical significance of areas like the Enfield Town Conservation Area. The Council is committed to maintaining a balance between development and conservation, and any proposals for tall buildings will undergo rigorous assessment to ensure they do not detract from the character and heritage of Enfield Town. The Plan's policies are designed to provide clear guidance while allowing for flexibility in how developments are implemented, ensuring that they meet both current needs and long-term goals for sustainable, heritage-conscious growth. | No | 01670 | Cllr Rye |
| **DM DE6: Tall buildings** | The Group's primary concerns relate to the impact of densification and tall buildings on the area's historic and visual character, particularly around Southgate Circus, which includes the Charles Holden-designed Southgate Underground Station and the Southgate Circus Conservation Area. The Conservative Group opposes the proposed tall buildings around Southgate Circus, which could reach up to 30 meters in height. They argue that these developments would negatively impact the views and setting of Southgate's historical sites, particularly the iconic Southgate Underground Station and views from Grovelands Park. They believe that the proposed densification and tall buildings are out of character with the existing area and would harm the overall historical and visual integrity of the Southgate Circus Conservation Area. The Group recommends revisiting Policy DE6 and reinstating the more restrictive policies from the current Enfield Local | Comments noted. The Draft Enfield Local Plan has been carefully developed to balance the need for housing and economic growth with the preservation of Enfield's unique character and heritage. The Spatial Strategy and Overall Approach Topic Paper outlines that the focus on areas like Southgate for higher-density development, including taller buildings, is driven by the strategic objective to concentrate growth in locations that are well-served by public transport and existing infrastructure. Southgate, with its Underground station and surrounding amenities, is identified as a suitable location for accommodating this growth, which is necessary to meet the borough's housing needs while minimizing the impact on less developed areas, including the Green Belt. Moreover, the Plan includes provisions to ensure that any new development respects the existing character and heritage of areas like Southgate. Specifically, the design and scale of new | No | 01670 | Cllr Ioannou |

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| | Plan. They argue that this would help preserve the character and historical integrity of Southgate by preventing the development of excessively tall buildings that would be inconsistent with the area's existing low-rise architecture. They also suggest that Policy H4 should be revised to focus exclusively on brownfield sites, in line with the London Plan's guidelines. This would ensure that new housing developments do not compromise the character of established residential areas or conservation sites. They consider these objections and recommendations reflect the Group's commitment to preserving Southgate's unique historical and architectural character while still accommodating necessary development in a way that aligns with local and regional planning guidelines. | buildings are subject to rigorous assessment to ensure they complement the historical and architectural significance of sites like the Charles Holden-designed Southgate Underground Station. The Plan aims to integrate new developments in a way that enhances the local environment, supporting both conservation and sustainable growth. | | | |
| **DM DE6: Tall buildings** | The Enfield Council Conservative Group raises significant objections to the Draft Enfield Local Plan, particularly criticizing the housing targets and proposed Green Belt developments. They argue that the housing targets in the Draft Plan are inflated and not based on actual need, contending that Enfield Council has set these higher targets to justify encroachment on the Green Belt, which the Mayor of London opposes. The Group emphasizes that the Plan should align with the London Plan's targets, focusing on meeting housing needs within existing urban areas without resorting to Green Belt development. They strongly support the Mayor's stance that there are no "exceptional circumstances" warranting Green Belt release and stress the importance of protecting these areas to prevent urban sprawl and encourage urban regeneration. In response to these concerns, the Group recommends revising the housing targets downward to be consistent with the Mayor of London's figures, thereby avoiding unnecessary Green Belt development. They advocate for the removal of proposed developments in Chase Park, Crews Hill, and Hadley Wood from the Local Plan to safeguard these areas from inappropriate development. Additionally, they call for reinstating more restrictive policies on tall buildings and ensuring that the Plan's policies apply only to brownfield sites, aligning with the London Plan and preserving the character of Enfield's neighborhoods. These recommendations are aimed at ensuring the Local Plan is legally compliant, sustainable, and reflective of both local and regional priorities. | Comments noted. The housing targets outlined in the Draft Local Plan are informed by a comprehensive analysis of Enfield's housing needs and the borough's capacity to accommodate growth. As set out in the Spatial Strategy and Overall Approach Topic Paper, these targets were established by considering local housing demand and the broader strategic objectives of the London Plan. The Plan's stepped approach to delivering new homes balances short-term and long-term growth, ensuring that Enfield meets its housing obligations within the framework of sustainable development. This strategy is aligned with the overarching goal of minimizing pressure on the Green Belt by prioritizing development in areas with existing infrastructure and public transport links, which is crucial for maintaining the borough's environmental and community character. Regarding the approach to tall buildings, the Draft Local Plan includes rigorous guidelines to ensure that new developments, including taller buildings, are integrated thoughtfully into the urban fabric. The Design and Character evidence base emphasizes that tall buildings should be located in areas where their scale can be accommodated without harming the local character, particularly in areas with strong public transport connectivity. The Plan includes specific design criteria to ensure that tall buildings contribute positively to the skyline and do not detract from the historical and architectural significance of nearby heritage assets. These guidelines ensure that tall buildings are not only a response to housing demand but also a means to enhance urban areas while preserving the unique character of Enfield. | No | 01670 | Cllr Smith |
| **DM DE6: Tall buildings** | The Enfield Council Conservative Group raises significant objections to the Draft Enfield Local Plan, particularly concerning the proposed developments on Green Belt land in areas such as Chase Park, Crews Hill, and Hadley Wood. They argue that these proposals do not meet the "exceptional circumstances" required by national policy to justify encroachment on the Green Belt. The Group is concerned that the proposed changes to Green Belt boundaries could lead to urban sprawl, merging distinct communities, and negatively impacting local wildlife and newly planted areas. Additionally, they criticize the Draft Plan for not adequately exploring all brownfield site options before considering Green Belt development, and for inflating housing targets without sufficient supporting evidence. They also highlight the lack of alignment with the Mayor of London's strategy, which focuses on development within urban boundaries and protecting the Green Belt. To address these concerns, the Conservative Group recommends removing the proposed Green Belt developments from Policy SS1 to protect these areas and maintain the distinct character of Enfield. They also suggest revisiting the policies on tall buildings, advocating for the reinstatement of more restrictive guidelines from the current Local Plan to ensure new developments are in keeping with the borough's existing character. Furthermore, they propose revising Policy H4 to focus exclusively on brownfield sites, in line with the London Plan's guidelines, to avoid unnecessary Green Belt development and ensure that new housing is integrated into areas with existing infrastructure. These recommendations aim to ensure that the Local Plan promotes sustainable development while preserving Enfield's Green Belt and character. | Comments noted. The housing targets outlined in the Draft Local Plan are informed by a comprehensive analysis of Enfield's housing needs and the borough's capacity to accommodate growth. As set out in the Spatial Strategy and Overall Approach Topic Paper, these targets were established by considering local housing demand and the broader strategic objectives of the London Plan. The Plan's stepped approach to delivering new homes balances short-term and long-term growth, ensuring that Enfield meets its housing obligations within the framework of sustainable development. This strategy is aligned with the overarching goal of minimizing pressure on the Green Belt by prioritizing development in areas with existing infrastructure and public transport links, which is crucial for maintaining the borough's environmental and community character. Regarding the approach to tall buildings, the Draft Local Plan includes rigorous guidelines to ensure that new developments, including taller buildings, are integrated thoughtfully into the urban fabric. The Design and Character evidence base emphasizes that tall buildings should be located in areas where their scale can be accommodated without harming the local character, particularly in areas with strong public transport connectivity. The Plan includes specific design criteria to ensure that tall buildings contribute positively to the skyline and do not detract from the historical and architectural significance of nearby heritage assets. These guidelines ensure that tall buildings are not only a response to housing demand but also a means to enhance urban areas while preserving the unique character of Enfield. | No | 01670 | Cllr Laban |
| **DM DE6: Tall buildings** | The Enfield Council Conservative Group criticizes the Draft Enfield Local Plan, highlighting the Council's poor housing development record, particularly | Comments noted. The housing targets and proposed developments within the Draft Local Plan are underpinned by a comprehensive evidence base that | No | 01670 | Cllr Chamberlain |

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| | referencing the underperformance of the Meridian Water project. They argue that this failure is being used to justify unnecessary development on Green Belt land, driven by political motivations rather than actual need. The Group believes that the Council has not fully explored alternatives to Green Belt development, such as brownfield sites, and accuses the administration of inflating housing needs to support its agenda. They also criticize the Draft Plan for being unambitious in identifying non-Green Belt areas for potential development, further exacerbating the pressure on Green Belt land. In response, the Conservative Group recommends deleting proposals for Green Belt development in areas like Chase Park, Crews Hill, and Hadley Wood from Policy SS1, as well as removing related site allocations and policies to protect these areas. They also call for the reinstatement of more restrictive policies on tall buildings to ensure new developments are in keeping with the borough's character. Additionally, they suggest revising Policy H4 to focus exclusively on brownfield sites, aligning with the London Plan's guidelines to avoid unnecessary encroachment on the Green Belt and to integrate housing into areas with existing infrastructure. These recommendations aim to ensure that the Local Plan is legally compliant, sustainable, and reflects both local and regional priorities. | considers both local and regional needs. The Spatial Strategy and Overall Approach Topic Paper emphasizes that the Plan was developed to address the significant housing demand within Enfield, balanced against the need to protect the borough's character and environmental assets. The Plan takes a strategic approach by focusing on sustainable locations for growth, including areas with existing infrastructure and public transport, while minimizing the impact on the Green Belt. The IIA further supports this by demonstrating how the Plan's policies have been assessed for their environmental, social, and economic impacts, ensuring that the proposed developments align with the principles of sustainable development. Regarding the use of Green Belt land, the Plan includes a thorough Green Belt Review that justifies the release of certain sites only where "exceptional circumstances" exist, in line with national policy. The decision to consider Green Belt land for development was not taken lightly; it reflects the constraints of available brownfield sites and the urgent need to meet housing targets. The IIA also provides a detailed assessment of alternative options, reinforcing that the selected sites for development, including those on Green Belt land, are the most suitable for achieving the Plan's objectives while minimizing harm to the environment and community character. | | | |
| **DM DE6: Tall buildings** | The Enfield Conservative Group raises significant objections to the Draft Enfield Local Plan, focusing on the inadequacy of public transport infrastructure in areas such as Crews Hill, Chase Park, and Hadley Wood, where large-scale residential developments are proposed. They argue that these areas are poorly served by public transport, with existing services already at capacity. The Group emphasizes that without major improvements to public transport, new developments in these areas would likely lead to increased car dependency, traffic congestion, and environmental harm, which contradicts the principles of sustainable development. In response to these concerns, the Group recommends deleting the proposed developments in these areas from Policy SS1 and related site allocations, as they lack the necessary infrastructure to support sustainable growth. They also suggest reinstating more restrictive policies on tall buildings to ensure new developments align with the borough's existing character and infrastructure capacity. Additionally, they propose that Policy H4 should focus exclusively on brownfield sites, consistent with the London Plan's guidelines, to prevent unnecessary Green Belt development and to ensure that new housing is built in areas with sufficient infrastructure. These recommendations aim to ensure that the Local Plan supports sustainable development while preserving Enfield's Green Belt and community character. | Comments noted. The Draft Enfield Local Plan has been developed with a comprehensive approach to address the borough's housing needs while ensuring sustainable growth. The Spatial Strategy and Overall Approach Topic Paper highlights that the Plan strategically focuses on enhancing public transport and infrastructure in key growth areas, including those identified in Crews Hill, Chase Park, and Hadley Wood. While these areas currently have lower Public Transport Accessibility Levels (PTAL), the Plan includes provisions for future infrastructure improvements, such as enhanced bus routes, cycling paths, and other transport links that will support the sustainable development of these areas over time( Enfield Council. This proactive approach is designed to mitigate potential increases in car dependency and traffic congestion, aligning with the broader goals of reducing environmental impact and promoting active travel options. Furthermore, the Design and Character evidence base ensures that any new developments, including those in areas with current transport challenges, are integrated in a way that complements the existing character and infrastructure of the borough. The Plan outlines specific design criteria to ensure that developments are appropriate in scale and impact, considering both current and future transport capabilities. The inclusion of tall buildings, where proposed, is carefully evaluated to ensure they contribute positively to the urban fabric without overwhelming the local infrastructure. The Council remains committed to ongoing consultation and refinement of the Plan, ensuring that it remains aligned with the principles of sustainable development while addressing the community's needs and preserving Enfield's unique character. | No | 01670 | Cllr Fallart |
| **DM DE6: Tall buildings** | The Enfield Council Conservative Group expresses significant concerns about the Draft Enfield Local Plan, particularly its approach to Green Belt development and the proposed introduction of tall buildings in areas like Southgate. They argue that the Plan unjustifiably targets Green Belt areas for development, such as Chase Park, Crews Hill, and Hadley Wood, without fully exploring alternatives like brownfield sites. The Group believes this approach contradicts national policies designed to protect the Green Belt and could lead to unnecessary urban sprawl. They also criticize the housing targets in the Plan as excessively high, not reflecting the actual population trends in London, and likely leading to developments that could harm the character of the borough. To address these | Comments noted. The Draft Local Plan has been carefully developed to address the significant housing needs within Enfield while adhering to sustainable development principles. According to the Spatial Strategy and Overall Approach Topic Paper, the Plan includes a thorough review of the Green Belt, identifying sites where "exceptional circumstances" justify the release of land. This is done to meet critical housing demands that cannot be fulfilled through brownfield sites alone. The Plan strategically focuses on minimizing the impact on the most sensitive areas by directing growth toward locations that can accommodate development while preserving the essential functions of the Green Belt, such as preventing urban sprawl and maintaining the character of the borough's distinct | No | 01670 | Cllr Morreale |

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| | concerns, the Conservative Group recommends removing the proposals for Green Belt development in the specified areas to protect these lands and maintain their distinct character. They also suggest reinstating more restrictive policies on tall buildings, as outlined in the current Local Plan, to ensure new developments are in line with the borough's existing character and scale. Additionally, they propose revising Policy H4 to focus exclusively on brownfield sites, consistent with the London Plan's guidelines, to avoid unnecessary Green Belt development and better integrate new housing into areas with existing infrastructure. These recommendations aim to ensure that the Local Plan supports sustainable development while preserving Enfield's Green Belt and community identity. | communities. Regarding the introduction of tall buildings, the Design and Character evidence base ensures that any new developments, including those involving taller structures, are designed to complement the existing urban fabric and preserve the character of areas like Southgate. The Plan includes stringent design criteria to ensure that taller buildings are appropriately located and do not detract from the historical and architectural significance of nearby heritage assets, such as the Southgate Underground Station. By focusing on areas with strong transport links and existing infrastructure, the Plan aims to integrate new developments in a way that enhances urban areas while safeguarding the unique character of Enfield's neighborhoods. The Council remains committed to ensuring that the Local Plan is both legally compliant and responsive to the community's needs, promoting sustainable growth that respects Enfield's Green Belt and architectural heritage. The Plan's approach to housing targets, Green Belt protection, and tall buildings demonstrates a balanced strategy aimed at fostering development that aligns with regional planning objectives and local character preservation. | | | |
| **DM DE6: Tall buildings** | The Councillor for Southgate Ward expressed concerns that the proposed policy DE6 allows high-rise and high-density buildings significantly deviates from Enfield Council's Enfield Development Management Document (2014), which restricted tall buildings in sensitive areas to preserve local views and the skyline. They emphasized that Southgate is primarily composed of low-rise residential homes and businesses, including conservation areas. Introducing high-rise buildings would drastically alter the character of the area, contrasting sharply with the existing built environment. | Comments noted. The Local Plan identifies that tall buildings may be appropriate in specified strategic locations, including town centres. This approach is supported so to make best use of land in a sustainable location and to reflect the evolving character of this town centre. The Council's approach is consistent with London Plan Policy D3 which seeks to ensure that site capacity is optimised through the design-led approach, particularly in well-connected locations. Policy is considered sound and compliant with aims of the NPPF particularly those relating to the protection and conservation of the Natural Environment. | No | 01836 | Cllr Morreale |
| **DM DE6: Tall buildings** | Councillor Emma Supple objects to DE6. She highlighted Enfield Town's historical significance, mentioning its ancient vicarage, church, and market square, which form an important heritage site. She argued that plans to build tall, tower buildings in this area are inappropriate and unacceptable, as they would harm the conservation area. She listed seven proposed sites for these buildings, including Palace Gardens, Enfield Town Station, and Tesco Southbury Road, deeming the proposal unsound. | Comments noted. The Local Plan identifies that tall buildings may be appropriate in specified strategic locations, including town centres. This approach is supported so to make best use of land in a sustainable location and to reflect the evolving character of this town centre. The Council's approach is consistent with London Plan Policy D3 which seeks to ensure that site capacity is optimised through the design-led approach, particularly in well-connected locations. Policy is considered sound and compliant with aims of the NPPF particularly those relating to the protection and conservation of the Natural Environment. | No | 02003 | Cllr Supple |
| **DM DE7: Creating liveable, inclusive and quality public realm** | The Metropolitan Police Service Design Out Crime Team emphasises creating safe and accessible routes and spaces for all users, especially disabled individuals, those with mobility impairments, and children in pushchairs, ensuring these areas are well-lit and inclusively designed. Additionally, developments should incorporate safety and counter-terrorism measures to mitigate risks like anti-social behavior without compromising the aesthetic and functionality of streets and public spaces, particularly in crowded or important civic areas. | Comments noted. The council supports the integration of crime prevention and counter-terrorism measures early in the design process, as emphasized by the Metropolitan Police Service Design Out Crime Team. The policy aligns with the London Plan and the National Planning Policy Framework (NPPF), ensuring the delivery of Secured by Design principles in Enfield. This approach enhances safety and security for residents and the community by incorporating proven crime prevention measures during the design and planning stages. Each application will be evaluated on a case-by-case basis, ensuring tailored solutions that promote safety and resilience. | No | 01721 | Metropolitan Police Service Design out Crime Team |
| **DM DE7: Creating liveable, inclusive and quality public realm** | TfL welcome the added reference to the Healthy Streets Approach in part 2a. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM DE7: Creating liveable, inclusive and quality public realm** | Savills, on behalf of Asda, generally supports the remainder of the Enfield Local Plan but recommends ensuring flexibility within detailed policies to apply them appropriately. They note that several policies, such as SE2 (Sustainable Design and Construction Statement), SE9 (use of SuDS), DE3 (creating accessible spaces), DE7 (improving public realm quality), and DE11 (landscaping schemes), apply to "all development." However, Savills argues that it may be impractical or disproportionate for minor developments to meet these requirements. They suggest amending the policy wording to include "where applicable to the type of | The council welcomes Asda's general support of the Enfield Local Plan. The Council appreciate their feedback on ensuring flexibility within detailed policies to apply them appropriately. The Council will consider amending the policy wording to include "where applicable to the type of development and appropriate to do so," particularly for policies SE2, SE9, DE3, DE7, and DE11. This adjustment aims to accommodate the varying nature of development proposals while maintaining the council's commitment to sustainable design and quality public spaces. This | Yes | 01732 | Asda Stores Ltd |

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| | development and appropriate to do so" to accommodate the varying nature of development proposals. | approach ensures that policies are practical and proportionate, aligning with Enfield's sustainable development goals as outlined in the Enfield Viability Update. | | | |
| **DM DE7: Creating liveable, inclusive and quality public realm** | Vistry Group supports high-quality public realm development, which enhances well-being and biodiversity. However, they express concerns that the combined prescriptive policies (BG13, DE7, DE11) increase costs for developers, potentially conflicting with other objectives like affordable housing. They note that highly landscaped public realms, as required by these policies, may not be sustainable for Council maintenance teams. Vistry suggests these policies be assessed on a site-by-site basis to ensure viability for both developers and Council maintenance teams. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **DM DE8: Design of business premises** | Joseph Homes Regeneration Limited suggests amending Draft Policy DE8 to reference the correct local policy for co-location of residential uses with industrial sites. The current draft inaccurately requires compliance with Policy E3, which pertains to Strategic Industrial Land (SIL). Instead, it should reference Policy E6, which is relevant for Locally Significant Industrial Sites (LSIS). The recommended amendment would ensure clarity and alignment with London Plan Policy E7. | Comments noted. The Council is committed to working collaboratively with Jpseph Homes Regeneration Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01875 | Joseph Homes Regeneration Limited |
| **DM DE8: Design of business premises** | Joseph Homes Regeneration Limited suggests amending Draft Policy DE8 to reference the correct local policy for co-location of residential uses with industrial sites. The current draft inaccurately requires compliance with Policy E3, which pertains to Strategic Industrial Land (SIL). Instead, it should reference Policy E6, which is relevant for Locally Significant Industrial Sites (LSIS). The recommended amendment would ensure clarity and alignment with London Plan Policy E7. | Comments noted. The Council is committed to working collaboratively with Jpseph Homes Regeneration Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01875 | Joseph Homes Regeneration Limited |
| **DM DE8: Design of business premises** | CCLA Investment Management supports maintaining and intensifying business premises but stresses the need for pragmatic application. They suggest focusing on modernized floorspace, operational efficiency, building height, infrastructure investment, resilience, sustainability, and operational flexibility. Regarding the co-location of residential and commercial uses, they emphasize this should only be acceptable if the operational functionality of surrounding industrial units is not compromised, in line with London Plan Policy E7. They propose adding a clause to ensure compliance with NPPF paragraph 35(d): "Co-location will only be considered acceptable where operational function | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **DM DE8: Design of business premises** | SEGRO requests a meeting to discuss their responses and the application of the policy for new employment proposals, recognizing differences between single development plots and estate-scale redevelopments. They support key pedestrian routes where feasible but believe strict application of other criteria could lead to inflexible design solutions that do not meet modern business needs. SEGRO suggests the policy should allow a planning balance exercise, considering site-specific characteristics. They recommend changing point 1 of the policy from "will only be permitted where it:" to "should consider the following:" to introduce more flexibility. | The council appreciates SEGRO's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with SEGRO and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01922 | SEGRO |
| **DM DE10: Conserving and enhancing heritage assets** | Historic England considers the current wording of Policy DE10 to be unsound. While they support the intent behind Clause 11 to secure heritage benefits in specific circumstances, they share concerns similar to those expressed regarding Policy DE6. Clause 11 implies that an undefined level of adverse impact on heritage assets might be acceptable, provided a Section 106 agreement is secured. Historic England believes this could inadvertently encourage harmful development proposals. To avoid this, they propose an amendment to clarify that such scenarios should be rare and only permitted under exceptional circumstances. To address the Policy's soundness, they suggest clause 11 is amended to: "Proposals affecting heritage assets should secure opportunities to | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |

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| | conserve, enhance, or better reveal heritage significance through Section 106 agreements, but only in exceptional circumstances where harm cannot be avoided, minimised, or otherwise mitigated.” This amendment reinforces the importance of avoiding harm to heritage assets and ensures that Section 106 agreements are used as a last resort in rare cases where other mitigation measures are not possible. | | | | |
| **DM DE10: Conserving and enhancing heritage assets** | Vistry Group supports protecting heritage in the Borough but raises concerns about point 10, which mandates planning contributions for Conservation Area Appraisal and Management Plans from developments with 50+ residential units. They argue this requirement exceeds typical mitigation measures and the 2016 Section 106 SPD, potentially imposing unnecessary financial burdens that could affect project viability. They request reconsideration of this policy. | The council appreciates Vistry Group’s support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **DM DE10: Conserving and enhancing heritage assets** | Residents express concerns regarding legal compliance, specifically the clarity of the term "Heritage Asset" in Policies DE4 and DE10. While the incorporation of Historic England's 2019 recommendations is acknowledged, residents urge that the definition in the 'Acronym Buster and Glossary' explicitly include both built and buried heritage resources. For Chase Park (section PL10), residents are worried about the lack of consideration for the likely multi-period buried archaeological resources in the development area, particularly prehistoric archaeology evidenced in other parts of Enfield Chase. They recommend that the Masterplan include a comprehensive archaeological assessment based on fieldwork. Additionally, while welcoming the proposal to create a heritage park at the former Slades Hill army camp and AA gun site, they stress the necessity of full archaeological documentation and possible excavation prior to development for effective site interpretation. | Comments noted. The Council acknowledges the concerns regarding the clarity of the term "Heritage Asset" in Policies DE4 and DE10 and will amend the glossary to include both built and buried heritage resources. For Chase Park, a comprehensive archaeological assessment based on fieldwork will be required in the Masterplan to address potential multi-period archaeological resources. Additionally, full archaeological documentation and necessary excavation will be prerequisites for developing the heritage park at the former Slades Hill army camp and AA gun site, ensuring effective site interpretation. | No | 00002 | Enfield Archaeological Society |
| **DM DE10: Conserving and enhancing heritage assets** | The Enfield Society raises several concerns regarding the policy's title and content. They argue that the policy title should align with national policy, which refers to "Conserving and enhancing the historic environment" rather than just "heritage assets." This distinction is crucial as it reflects the broader concept of sustainable development outlined in the National Planning Policy Framework (NPPF) paragraph 8c. The NPPF glossary distinguishes between "heritage assets" and the "historic environment," with the latter encompassing all aspects of the environment resulting from historical interactions between people and places. The Enfield Society believes this broader focus is essential for appropriately addressing the borough's Conservation Areas, such as Trent Park and Enfield Town Conservation Areas, which are key embodiments of the historic environment. Additionally, they highlight a lack of clarity in the plan regarding the location of Archaeological Priority Areas (APAs) and the implications for decision-makers. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **DM DE10: Conserving and enhancing heritage assets** | The Lake Estate Conservation Area Group is concerned that policy DE10 of the draft Local Plan does not sufficiently protect the unique characteristics of their Conservation Area as identified in the Character Appraisal. Specifically, they highlight the need for the policy to ensure that replacement joinery exactly replicates original designs rather than merely being similar. | Comment noted. This change is not considered to be necessary to make the policy sound. | No | 01813 | Lakes Estate Conservation Area Study Group |
| **DM DE11: Landscape design** | Savills, on behalf of Asda, generally supports the remainder of the Enfield Local Plan but recommends ensuring flexibility within detailed policies to apply them appropriately. They note that several policies, such as SE2 (Sustainable Design and Construction Statement), SE9 (use of SuDS), DE3 (creating accessible spaces), DE7 (improving public realm quality), and DE11 (landscaping schemes), apply to "all development." However, Savills argues that it may be impractical or disproportionate for minor developments to meet these requirements. They suggest amending the policy wording to include "where applicable to the type of development and appropriate to do so" to accommodate the varying nature of development proposals. | The council welcomes Asda's general support of the Enfield Local Plan. The Council appreciate their feedback on ensuring flexibility within detailed policies to apply them appropriately. The Council will consider amending the policy wording to include "where applicable to the type of development and appropriate to do so," particularly for policies SE2, SE9, DE3, DE7, and DE11. This adjustment aims to accommodate the varying nature of development proposals while maintaining the council's commitment to sustainable design and quality public spaces. This approach ensures that policies are practical and proportionate, aligning with Enfield’s sustainable development goals as outlined in the Enfield Viability Update. | Yes | 01732 | Asda Stores Ltd |

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| **DM DE11: Landscape design** | Vistry Group supports high-quality public realm development, which enhances well-being and biodiversity. However, they express concerns that the combined prescriptive policies (BG13, DE7, DE11) increase costs for developers, potentially conflicting with other objectives like affordable housing. They note that highly landscaped public realms, as required by these policies, may not be sustainable for Council maintenance teams. Vistry suggests these policies be assessed on a site-by-site basis to ensure viability for both developers and Council maintenance teams. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **DM DE11: Landscape design** | London Wildlife Trust welcome and support this policy. | Support noted. | No | 01974 | London Wildlife Trust |
| **DM DE11: Landscape design** | The Enfield Society contends that Policy DE11, aimed at protecting the historic landscape of Enfield Chase, is flawed and inconsistent with national and local policies. They argue the policy misunderstands the cohesive nature of Enfield Chase's historic landscape, including its woodlands, streams, parklands, and farmland. The lack of a recent comprehensive review of Areas of Special Character (ASC) undermines the policy, with the last significant review in 2013 emphasizing the preservation of Enfield Chase. The policy does not align with NPPF paragraph 180 or the London Plan, failing to protect valued landscapes and heritage assets. ENPlan's assessment suggests the policy would harm the historic landscape and conservation areas, including sites like Owls Hall and The Paddocks. Shifting from a strategic to a non-strategic policy could weaken protections, making the landscapes vulnerable to inappropriate development. Additionally, the draft Local Plan's lack of clear ASC boundaries and definitions creates ambiguity, and the policy overlooks the heritage and archaeological significance of Enfield Chase as recognized by Historic England. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **DM DE12: Civic and public developments** | The Enfield Society is concerned the Policy is unclear and potentially ineffective in protecting the Enfield Town Conservation Area from the impacts of proposed tall buildings, such as the 39m tall buildings at the Civic Centre and Dugdale Centre. Specifically: Ambiguity in Wording: The policy's requirement for development to "respect the heritage of an area and respond to local character and distinctiveness" is vague and lacks clear guidelines, making it difficult for decision-makers to enforce. Impact on Historic Assets: The policy might not effectively prevent overbearing tall buildings from negatively impacting historic assets, especially when other Local Plan policies and site allocations support such developments. Potential Ineffectiveness: The policy could fail to protect the character and distinctiveness of the Enfield Town Conservation Area if tall buildings are endorsed elsewhere in the Local Plan, leading to conflicting outcomes. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **DM DE13: Housing standards and design** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman's property within the development boundary, the reduction of green open space, and the conflict with Enfield's Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |
| **DM DE13: Housing standards and design** | Vistry Group supports maintaining clear guidelines for separation distances and privacy impacts but seeks flexibility in applying point 3, which mandates set-backs based on building height. They argue that rigid application could conflict with broader outline consents and other policy goals. Vistry suggests allowing daylight/sunlight analysis to demonstrate minimal impact, noting that the current | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |

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| | prescriptive approach might result in unfeasible set-backs given site constraints, potentially hindering efficient land use. | | | | |
| **DM DE13: Housing standards and design** | Places for London recognise that adequate access, parking, cycle parking and refuse storage should be provided in line with 'other policies in the development plan'; however, we strongly request that this is specified further to include reference to London Plan Policy T6, Car Parking. This requires that 'car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite')' (Section B). Framing Policy DEl3 in the context of this London Plan policy will continue to promote car-free development in locations already readily accessible by public transport services. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **DM DE13: Housing standards and design** | The Home Builders Federation (HBF) argues that Part 1e of the policy is unsound as it contradicts national policy. The policy requires applicants to build according to the BRE Home Quality Mark, an environmental performance standard not endorsed by the Government. On December 13, the Government clarified that local authorities should not mandate alternative environmental standards, especially those related to energy efficiency. Therefore, the reference to the BRE Home Quality Mark should be deleted. | Comments noted. To align with national policy and ensure the soundness of our Local Plan, we will consider deleting the reference to the BRE Home Quality Mark from Part 1e of the policy. | Yes | 01851 | Home Builders Federation |
| **DM DE14: External amenity standards** | The NHS London Healthy Urban Development Unit welcomes that external amenity standards align with the London Plan requirements. However, they note that paragraph 7.111 mentions the minimum requirement may not be sufficient for all sites but does not specify how much more should be provided. They suggest including a quantified amount to ensure adequate provision on these sites. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **DM DE14: External amenity standards** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman’s property within the development boundary, the reduction of green open space, and the conflict with Enfield’s Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |
| **Chapter 8: Homes for All** | | | | | |
| **SP H1: Housing development sites** | The London Borough of Redbridge supports Strategic Policy H1 and its ambitious target of 33,280 homes over 22 years, an increase from the previous target of 24,920 over 20 years in the Regulation 18 plan. They note Enfield's 10-year housing target of 1,246 homes per year from 2019-2029, as stated in the London Plan. However, they emphasise the need for Enfield to properly calculate, rather than merely "roll forward," a housing target extending to 2041 or the proposed end of the plan period. | Comments noted. The London Borough of Enfield appreciates the support from the London Borough of Redbridge for Strategic Policy H1 and its ambitious housing targets. Regarding the calculation of housing targets beyond 2029, the methodology employed is consistent with paragraph 4.1.11 of the London Plan (2021). This approach is thoroughly detailed in the Housing Topic Paper, and it underpins the housing trajectory extending to 2041, ensuring a robust and forward-looking strategy for meeting Enfield’s housing needs. | No | 01603 | London Borough of Redbridge |
| **SP H1: Housing development sites** | The NHS London Healthy Urban Development Unit acknowledges the challenge Enfield Council faces in meeting its target of 34,000 homes within the plan period and has provided detailed comments on the allocated housing sites. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP H1: Housing** | London borough of Waltham Forest (LBWF) broadly support the approach in the Homes for All chapter. Under the Duty to Cooperate, they will continue working | The Council welcomes the broad support for the approach outlined in the Homes for All chapter. We greatly value the commitment to working with Enfield under the | No | 02006 | London borough of |

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| **development sites** | and supporting colleagues at the London Borough of Enfield on cross-boundary housing delivery sites, particularly within Meridian Water (PL5). | Duty to Cooperate, particularly regarding cross-boundary housing delivery sites within the Meridian Water area (PL5). Ongoing collaboration and support are crucial as both Enfield and Waltham Forest aim to address housing needs and deliver sustainable communities across our boroughs. This partnership is essential for achieving our shared goals and ensuring effective housing strategies. | | | Waltham Forest |
| **SP H1: Housing development sites** | The Diocese of London emphasizes the importance of assessing land availability in Local Plans as per the NPPF guidelines. They reference the Housing and Economic Land Availability Assessment (HELAA), which identifies their site in parcels CHC11-13 as potentially developable for residential use, suitable for delivery in the later stages of the plan. However, they argue that the site could be delivered within the first five years to address immediate housing needs. Additionally, they suggest the site is suitable for various uses beyond residential development. | The Council appreciates the Diocese's recognition of Enfield's approach to calculating housing need and addressing Green Belt release. They acknowledge the feedback and will review the housing target in Policy SS1 to ensure clarity, with the target of 33,280 homes based on detailed housing assessments. The Exceptional Circumstances and Site Allocation Topic Papers justify the proposed Green Belt releases, prioritizing sustainable development and aligning with NPPF guidelines. The council will further evaluate certain sites, including the Land at Jesus Church, for their potential to address immediate housing needs. The Plan's spatial strategy ensures development is supported by necessary infrastructure and maintains a 5-year housing land supply through a mix of brownfield and greenfield developments. The Diocese's insights will be considered as the Local Plan is refined, with ongoing dialogue welcomed to achieve shared objectives. For more details, refer to the Site Allocation Topic Paper. | No | 01744 | Diocese of London |
| **SP H1: Housing development sites** | The Diocese of London supports Enfield's Housing Topic Paper (2024) and the draft Local Plan's approach to addressing housing challenges, particularly the need for affordable family housing, which justifies Green Belt release. They agree with the identification of constraints on brownfield land delivery and propose their site for early delivery due to its minimal constraints. They emphasize the importance of delivering more market homes to facilitate affordable housing and suggest bringing forward more deliverable sites within the first five years of the plan to meet both quantitative and qualitative housing needs. | The council welcomes the Diocese's feedback and support regarding the Housing Topic Paper (2024) and the draft Local Plan. The council acknowledge the challenges of delivering affordable family housing and the necessity of Green Belt release. The plan's strategy prioritizes sustainable development while addressing housing needs. Their site will be considered alongside other potential sites for early delivery. The council appreciate the Diocese's proactive approach and will incorporate their suggestions to ensure the Enfield Local Plan remains robust and flexible, meeting both quantitative and qualitative housing demands. Further discussions will follow to align on these objectives. This approach is justified based on the evidence provided in the Site Allocation Topic Paper, which emphasizes sustainable site selection and strategic development planning. | No | 01744 | Diocese of London |
| **SP H1: Housing development sites** | Turley on behalf of Royal London propose changes to the wording of this Policy to improve flexibility ('social infrastructure' rather than 'leisure/recreation'). | Noted. The Council will enter into a Statement of Common Ground with Royal London to address these concerns and ensure alignment with strategic goals and policies. | No | 01749 | Royal London Mutual Insurance Society Limited for Southbury Leisure Park |
| **SP H1: Housing development sites** | Vistry Group references relevant commentary on the number of homes for key sites in the site-specific considerations section, providing detailed feedback on housing capacities and other related aspects for these sites. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **SP H1: Housing development sites** | The Diocese supports the allocation SA10.1 as part of Greenbelt release for an urban extension is supported and is considered essential to enable the proposed infrastructure to come forward. The approach is fully justified and set out elsewhere in detail in these representations. | Support Noted. | No | 01913 | Diocese of London |
| **SP H1: Housing development sites** | The Meridian Water team supports the ambition to deliver 33,280 new dwellings over the Plan period from 2019 to 2041, acknowledging the clear evidence of a policy-compliant 'brownfield first' approach in Table 8.1. They note the estimated capacities of Meridian Water sites and seek further dialogue with the LPA to refine these figures, ensuring they reflect up-to-date evidence and are deliverable. The team emphasizes that the capacity figures should be considered as minimums and should be tested and refined through future masterplanning, optimizing brownfield capacity in line with London Plan Policy D3. | The supportive response is welcomed regarding the ambition to deliver 33,280 new dwellings over the Plan period 2019 to 2041. The Council appreciates their recognition of the 'brownfield first' approach, as outlined in Table 8.1. This approach is comprehensively justified in the Spatial Strategy and Overall Approach Topic Paper, which emphasizes sustainable development through the optimal use of previously developed land. The council acknowledges their comments regarding the estimated capacities of Meridian Water sites and are open to refining these figures based on up-to-date evidence. The Site Allocation Topic Paper provides detailed justification for the allocation of these sites and recognises a commitment to a design-led approach as stipulated by London Plan Policy D3. The council is committed to working collaboratively and are open to further dialogue. To this end, | No | 01945 | Meridian Water (LBE) |

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| | | the council will establish a Statement of Common Ground to ensure that the policy and associated site allocations are both robust and deliverable. | | | |
| **SP H1: Housing development sites** | Lansdown supports Policy H1, which covers the Chase Park South allocation, and mentions a typo in the Estimated Capacity box related to housing for older people. They recommend correcting this to align with the overall policy approach for the site. Lansdown suggests modifying the estimated capacity box in Policy H1 to remove the specific mention of "95 homes for older persons" and instead refer to 3,600 homes in total, of which 2,550 would be delivered within the plan period, including homes for older persons. | The constructive feedback is welcomed and the council looks forward to continuing collaboration as we work toward the shared goal of delivering sustainable and inclusive housing solutions for Enfield's future. | No | 01998 | Landsdown |
| **SP H1: Housing development sites** | The Enfield Society argues that the Local Plan's policy for increasing housing supply is not consistent with London Plan Policy H1 and would cause significant harm to Enfield's historic and natural heritage. They believe that the dramatic increase in housing, especially on Green Belt sites, is unjustified and not necessary for meeting housing needs. They also criticize the 'capacity-led' approach for including valued open spaces as development capacity and raise concerns about the long-term sustainability of housing delivery, citing that many proposed sites will take years to develop. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP H2: Affordable housing** | The GLA welcomes the proposed target of 50% of all new homes being affordable, as it aligns with LP2021 Policy H4. | Support noted. | No | 00120 | Greater London Authority (GLA) |
| **SP H2: Affordable housing** | The GLA supports Part 6 of Policy H2 in the draft ELP, as it aligns with LP2021 Policy H5. | Support noted. | No | 00120 | Greater London Authority (GLA) |
| **SP H2: Affordable housing** | The GLA clarifies that the affordable housing thresholds in LP2021 are not minimum requirements but indicate levels above which viability assessments are not needed under the fast track approach. Treating these thresholds as targets could wrongly suggest that failing to meet them is grounds for refusing planning permission, which is not the Mayor's intent. The GLA recommends amending Paragraph 8.20 to clarify the correct approach. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | Yes | 00120 | Greater London Authority (GLA) |
| **SP H2: Affordable housing** | The GLA notes that Part 3 of Policy H2 sets a 50/50 tenure split for social and intermediate affordable housing, aligning with LP2021 Policy H6, which requires at least 30% for each tenure type, with the remaining 40% based on local evidence. LP2021 Paragraph 4.6.2 presumes this 40% will be used for Social and London Affordable Rent, reflecting a London-wide need. The GLA encourages LBE to provide evidence justifying the 50/50 split. | Enfield Council refers to Paragraph 8.22 of the Enfield Local Plan (ELP), which cites the Enfield Local Housing Needs Assessment as evidence justifying the proposed tenure split. Therefore, no change is proposed based on this evidence. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP H2: Affordable housing** | Redbridge also supported the policy H2 provision of 50% affordable housing on Green Belt land and the clarified wording on how this policy applies to sites released from the Green Belt. | Support noted. The London Borough of Enfield appreciates the London Borough of Redbridge's support for Policy H2, which requires the provision of 50% affordable housing on Green Belt land. The Council also value the acknowledgment of the clarified wording on how this policy applies to sites released from the Green Belt. This policy aligns with Enfield's commitment to addressing housing affordability while balancing development and environmental protection. | No | 01603 | London Borough of Redbridge |
| **SP H2: Affordable housing** | The NHS London Healthy Urban Development Unit supports the aim to secure 50% affordable housing on industrial and Green Belt sites and 35% on other major developments, aligning with London Plan policy H5. They emphasize that affordable housing significantly impacts tenants' and homeowners' mental and physical health and support higher affordable housing requirements if increased need is identified. They also welcome the inclusion of intermediate housing and | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of | No | 01872 | NHS London Healthy Urban Development Unit |

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| | suggest highlighting affordable rent housing for key workers, especially NHS staff, within the policy. | Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SP H2: Affordable housing** | London borough of Waltham Forest (LBWF) note that Enfield's guideline mix of 50% social/affordable rented housing and 50% intermediate housing contrasts with Waltham Forest's 70% low-cost affordable rent and 30% intermediate housing products. | The Council acknowledges the London Borough of Waltham Forest's (LBWF) note regarding the difference in affordable housing mix guidelines. Enfield's guideline mix of 50% social/affordable rented housing and 50% intermediate housing aims to address local housing needs as identified in the Enfield Local Housing Needs Assessment 2020. This approach is justified to ensure a balanced provision of affordable housing options catering to diverse community needs. The Council welcome ongoing dialogue and collaboration with LBWF to align our strategies and meet the housing needs across our boroughs effectively. | No | 02006 | London borough of Waltham Forest |
| **SP H2: Affordable housing** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman's property within the development boundary, the reduction of green open space, and the conflict with Enfield's Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |
| **SP H2: Affordable housing** | The Duchy of Lancaster's response acknowledges that most planned development in Enfield, according to Policy SS1, will be concentrated in the east and in Opportunity Areas like Meridian Water and New Southgate, which are likely to be high-density, tall developments. They emphasize the importance of addressing housing needs qualitatively and quantitatively, highlighting the site's (RUR.02) potential for lower-density, family-friendly housing that complements the Hadley Wood conservation area. They also note the draft Policy H2 requirement for 50% affordable housing on former Green Belt sites and request clarification on whether this is calculated by unit or habitable room. | The Council acknowledges the Duchy of Lancaster's response regarding the development potential at Camlet Way, particularly its ability to address housing needs both qualitatively and quantitatively. The Enfield Local Housing Needs Assessment (2020) identifies significant housing affordability issues, with the median house price now over 13 times the average annual earnings. Furthermore, the Enfield Housing Topic Paper (2024) confirms a pressing need for diverse housing types, including affordable family homes. The Council's viability assessments support the 50% affordable housing requirement on former Green Belt sites as justified. The evidence base provided in the Enfield Local Housing Needs Assessment, Housing Topic Paper, and Viability Update confirm the approach and underline the need for robust affordable housing provisions. The council is committed to further engagement and look forward to collaborating to ensure that the site can contribute effectively to meeting the borough's housing needs. Additionally, we will clarify whether affordable housing requirements apply on a unit or habitable room basis. | No | 01672 | Duchy of Lancaster |
| **SP H2: Affordable housing** | The Duchy of Lancaster highlights the significant rise in median house prices in Enfield from £114,000 in 2000 to £319,000 in 2019, leading to limited housing choices and overcrowding. They emphasize that the delivery of affordable housing on the site is crucial to addressing this housing need. | Comments noted. The Council acknowledges the Duchy of Lancaster's concerns regarding housing affordability and overcrowding. The Council's approach, as detailed in the Enfield Housing Needs Assessment and the Enfield Housing Topic Paper 2024, supports the delivery of affordable housing to meet local needs. The Council appreciate the Duchy's commitment to this objective and welcome further collaboration to ensure effective implementation. | No | 01672 | Duchy of Lancaster |
| **SP H2: Affordable housing** | McCarthy and Stone raise concerns regarding the affordable housing requirements in Enfield's Local Plan Regulation 19 Consultation draft, highlighting the connection to London Plan policies H4 and H5, which set a strategic 50% affordable housing target. The Viability Update (August 2023) acknowledges that while specialist housing for older people can bear some affordable housing costs, achieving policy-compliant levels is challenging. They argue this policy may lead to extended viability discussions, slowing down the decision-making process. They recommend that Policy H2 be amended to reflect these viability challenges and suggest exempting specialist housing from review mechanisms, which they consider inappropriate and inflexible for single-phase developments. They propose revisiting assumptions used in the Viability Assessment to ensure more accurate modelling for sheltered and extra care housing, addressing factors like unit density, communal space, and sales periods. They stress the need for clear policies on planning obligations and the necessity for realistic viability assessments to avoid hampering the delivery of much-needed older persons' housing. | The detailed feedback on the affordable housing requirements and viability considerations in our draft Local Plan, is welcomed. The Council appreciates the specific challenges associated with delivering specialist housing for older people and acknowledges their concerns about the viability of achieving the policy-compliant levels of affordable housing. The plan's Whole Plan Viability Update, supported by the Enfield Viability Update (2023), provides a robust framework for balancing affordable housing needs with development viability, as outlined in our Spatial Strategy and Overall Approach Topic Paper. While the council maintain the 50% affordable housing target to meet its strategic objectives, the council understand the necessity for flexibility. Therefore, the council will ensure that Policy H2 incorporates provisions allowing for site-specific viability assessments to adjust affordable housing contributions where justified. Regarding the Biodiversity Net Gain (BNG) target of 20%, the council confirm that this higher target is justified by local environmental needs and aligns with the plan's broader sustainability goals, as evidenced in the Enfield Recreation Mitigation Strategy. The council will | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |

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| | | review and refine the policy wording to ensure clarity and alignment with national guidance, thereby supporting viable and sustainable development. The Council is committed to ongoing collaboration with stakeholders, including McCarthy and Stone, to refine the plan's policies and support the delivery of diverse and much-needed housing options in Enfield. The council welcome further discussions to address specific concerns and ensure the successful implementation of the Local Plan. | | | |
| **SP H2: Affordable housing** | The Diocese of London generally supports Enfield's Local Plan, particularly the affordable housing target of 50%. They welcome the updated viability assessment but suggest flexibility in tenure mix for housing delivery. They propose including provisions in Policy H2 to address viability challenges, allowing lower affordable housing percentages if necessary. They also highlight inconsistencies in BNG requirements, advocating for additional viability testing for the 20% BNG target. They stress that achieving these ambitious targets requires viable sites and encourage the allocation of the Land at Jesus Church. | Comments noted. The council's approach is justified. The Viability Update supports the target of 50% affordable housing on greenfield sites, ensuring it is achievable without compromising development viability. While the council recognize the importance of smaller sites, the strategic focus remains on larger, sustainable developments to meet our comprehensive housing needs. The identified smaller sites complement this strategy, contributing to a balanced and diverse housing supply. | No | 01744 | Diocese of London |
| **SP H2: Affordable housing** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride raises concerns about the 50% affordable housing target in Policy H2, particularly given the viability challenges highlighted in the 2023 Whole Plan Viability Update. They note that development at Crews Hill is currently considered "marginal" in terms of viability.<br>Request for Flexibility: The representation suggests that the 50% target should be adjusted to be more flexible, proposing that the target should be set at 35% with the ambition to reach 50%, depending on the viability of specific developments. They recommend amending Policy H2 to state that developments in areas like Crews Hill should "seek to exceed 35% affordable housing with an ambition for 50%, subject to overall scheme viability." This would encourage more developments to come forward by making the requirements more attainable. The representation also advocates for a pragmatic approach to development costs, including affordable housing and infrastructure contributions, to ensure that developments remain viable and can proceed in a timely manner.<br>These recommendations are aimed at ensuring that the Local Plan remains viable and effective, particularly in areas where development viability is already marginal. The suggested amendments would allow for greater flexibility, potentially leading to more successful developments in the Crews Hill area. | Comments noted. The 50% affordable housing target is a key component of Enfield's strategy to address housing needs, especially in areas where greenfield sites can support higher levels of affordable housing. This target is based on the broader need to secure a mix of housing that meets the diverse needs of the borough's residents. While the Viability Update recognizes the marginal viability of some sites like Crews Hill, it also emphasizes that affordable housing contributions are crucial. The policy allows for a flexible approach where the 50% target can be adjusted based on specific site viability assessments, using the Viability Tested Route (VTR) when necessary. The Enfield Local Plan's approach balances the need for affordable housing with the realities of development viability. While the 50% target is ambitious, it is not inflexible. The Plan includes mechanisms to ensure that development remains viable, such as the Viability Tested Route, which allows for adjustments based on site-specific conditions. This ensures that while Enfield aims to meet its affordable housing goals, it remains realistic about the challenges developers may face in marginal areas like Crews Hill. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SP H2: Affordable housing** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride expresses concern about the 50% affordable housing target in Policy H2, particularly for developments in the Crews Hill area. They argue that the viability of such developments is marginal, as identified in the 2023 Whole Plan Viability Update. They suggest that the policy should be more flexible, proposing a lower affordable housing target of 35% with an ambition to reach 50%, depending on the overall viability of the project. Their recommendation is to amend Policy H2 to require a minimum of 35% affordable housing on former Green Belt sites like Crews Hill, with the potential to increase this to 50% if viable. They advocate for a pragmatic approach to affordable housing and overall development costs to ensure that projects are viable and more likely to proceed. Their recommendations aim to make the Local Plan more flexible and economically viable, particularly in areas where development is currently considered marginal. | Comments noted. The 50% affordable housing target is a key component of Enfield's strategy to address housing needs, especially in areas where greenfield sites can support higher levels of affordable housing. This target is based on the broader need to secure a mix of housing that meets the diverse needs of the borough's residents. While the Viability Update recognizes the marginal viability of some sites like Crews Hill, it also emphasizes that affordable housing contributions are crucial. The policy allows for a flexible approach where the 50% target can be adjusted based on specific site viability assessments, using the Viability Tested Route (VTR) when necessary. The Enfield Local Plan's approach balances the need for affordable housing with the realities of development viability. While the 50% target is ambitious, it is not inflexible. The Plan includes mechanisms to ensure that development remains viable, such as the Viability Tested Route, which allows for adjustments based on site-specific conditions. This ensures that while Enfield aims to meet its affordable housing goals, it remains realistic about the challenges developers may face in marginal areas like Crews Hill. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SP H2: Affordable housing** | Wolden Garden Centre highlights concerns about the 50% affordable housing requirement in Policy H2, particularly for developments in Crews Hill, which are currently considered marginally viable. They argue that the policy should allow more flexibility in affordable housing targets to ensure that development is feasible and land comes forward for development. They suggest modifying Policy H2 to seek 35% affordable housing, with the potential to increase to 50% based on site- | Comments noted. The 50% affordable housing target is a key component of Enfield's strategy to address housing needs, especially in areas where greenfield sites can support higher levels of affordable housing. This target is based on the broader need to secure a mix of housing that meets the diverse needs of the borough's residents. While the Viability Update recognizes the marginal viability of some sites like Crews Hill, it also emphasizes that affordable housing contributions are crucial. The policy allows for a flexible approach where the 50% target can be | No | 01887 | Wolden Garden Centre Ltd |

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| | specific viability. They recommend adopting a pragmatic approach to affordable housing and development costs to ensure the plan's viability and effectiveness. | adjusted based on specific site viability assessments, using the Viability Tested Route (VTR) when necessary. The Enfield Local Plan's approach balances the need for affordable housing with the realities of development viability. While the 50% target is ambitious, it is not inflexible. The Plan includes mechanisms to ensure that development remains viable, such as the Viability Tested Route, which allows for adjustments based on site-specific conditions. This ensures that while Enfield aims to meet its affordable housing goals, it remains realistic about the challenges developers may face in marginal areas like Crews Hill. | | | |
| **SP H2: Affordable housing** | Wolden Garden Centre raises concerns about the viability of the 50% affordable housing requirement, citing that development in Crews Hill is marginally viable according to the 2023 Whole Plan Viability Update. They argue that the Local Plan should adopt a more flexible approach to the affordable housing target to ensure that development remains feasible. They suggest modifying Policy H2 to seek 35% affordable housing, with the potential to increase to 50% based on viability. They recommend a pragmatic approach to affordable housing and development costs to enhance the plan's viability and effectiveness. | Comments noted. The Housing Topic Paper emphasizes the need for a balanced approach to housing, including the provision of affordable housing. However, it also supports flexibility based on site-specific conditions. The Viability Update acknowledges that development viability can vary, especially in areas like Crews Hill. The Plan's approach allows for adjustments to affordable housing targets through the Viability Tested Route (VTR), ensuring developments remain feasible while striving to meet housing goals. | No | 01887 | Wolden Garden Centre Ltd |
| **SP H2: Affordable housing** | Landvest Crews Hill Ltd argues that the 50% affordable housing requirement on former Green Belt sites, including Crews Hill, is unviable, and recommends reducing it to 40%. | The Council's housing and viability strategies outlined in the Enfield Housing Topic Paper (2024) and the Enfield Viability Update support the delivery of 50% affordable housing as a crucial part of addressing Enfield's housing needs, particularly in areas like Crews Hill. | No | 01894 | Landvest Crews Hill Ltd |
| **SP H2: Affordable housing** | Vistry Group supports the principle of 50% affordable housing on publicly owned land and 35% for other major developments, aligning with the London Plan (2021), and the 50/50 tenure split between intermediate and social rented housing. They aim to maximize affordable housing delivery through partnerships, sometimes achieving 100% affordable housing schemes. However, Vistry suggests draft policy H2 should consider site-specific circumstances impacting affordable housing delivery and explicitly state that the Viability Tested Route is available to justify lower affordable housing levels when necessary, reflecting market conditions and financial challenges. | Comments noted. The council's strategy is justified. Policy is clear that the provision of affordable homes is subject to viability. Council's approach to support safe, strong and cohesive communities and improve the quality of housing in Enfield and deliver a range of homes and increase access to affordable, good quality homes is supported. Policy helps support approaches to secure housing for critical key workers on land owned by Government departments and agencies. | Yes | 01897 | Vistry Group |
| **SP H2: Affordable housing** | Places for London broadly support Policy H2. However, Section I of the policy outlines that affordable housing will be measured based on 'habitable rooms', with Section 2 stating that it will be calculated based on 'gross housing floorspace' shortly afterwards. Places for London therefore strongly request clarity on which approach the Council intend to use to measure affordable housing provision to prevent confusion, and further suggest that this should be measured in habitable rooms, as per Paragraph 4.5.3 of London Plan. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **SP H2: Affordable housing** | NHS Property Services (NHSPS) acknowledges the Local Housing Need Assessment (2020) as part of the evidence base for the Draft Local Plan, which considers the housing needs of various groups, including key workers. While NHSPS does not find Draft Policy H2 unsound, they recommend explicitly reflecting the need for key worker housing in the policy wording or future supplementary documents or guidance. They emphasize the importance of affordable housing for NHS staff and other health and care providers to support the sustainability of the NHS, as proximity to affordable housing affects recruitment and retention. NHSPS suggests the Council engage with local NHS partners, include the need for affordable housing for NHS staff in future housing needs assessments and other relevant studies, and consider this need in site selection and allocation policies, especially near large healthcare employers. | The Council appreciates feedback from NHS Property Services and acknowledges the importance of addressing the housing needs of key workers, including NHS staff. Draft Policy H2, supported by the Local Housing Need Assessment (2020), the Enfield Housing Topic Paper (2024), and the Site Allocation Topic Paper for Regulation 19 (2024), provides a comprehensive framework for meeting these needs. The Council recognizes that affordable and accessible housing is crucial for the recruitment and retention of NHS staff, ensuring sustainable healthcare services. The Council will continue to engage with local NHS partners to address housing needs effectively, ensuring affordable housing for NHS staff is included in future assessments. The Infrastructure Delivery Plan will be regularly updated to reflect these needs. Ongoing dialogue and collaboration will refine policy details to support key workers' housing needs, with the Council welcoming the opportunity to work together through a Statement of Common Ground. | No | 01985 | NHS Property Services |
| **SP H2: Affordable housing** | Policy H2 proposes a minimum of 50% affordable housing for rural Placemaking Areas like Crews Hill. Paragraph 8.18 of the supporting text justifies this target based on findings from the Whole Plan Viability Assessment, which indicated that greenfield sites could support higher affordable housing levels due to their viability and potential for substantial developer contributions. However, the 2023 Viability Update indicates that development at Crews Hill is currently "marginal," with | Comments noted. The Council acknowledge the concerns regarding the viability of achieving a 50% affordable housing target at Crews Hill, the Enfield Viability Update (August 2023) presents a nuanced view of development potential. The update confirms that while development at Crews Hill is currently assessed as "marginal" with residual values below the benchmark land value, this does not preclude the possibility of meeting high affordable housing targets over time. The | No | 02001 | Tile Kiln Farm |

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| | residual values below the benchmark land value, suggesting challenges in achieving the 50% target. The update calls for a flexible approach to affordable housing in Crews Hill, especially in the early phases, and highlights concerns about additional costs such as S.106 contributions and site remediation that could further impact viability. | report highlights that development viability can be influenced by various factors, including market conditions and strategic planning adjustments. Moreover, the Update recognises that, despite current viability challenges, the Council remains committed to ensuring that the affordable housing target reflects both current and future market conditions. It is also important to consider that the 50% target is an aspirational figure aimed at driving high standards of affordable housing provision where feasible. The Council is prepared to adopt a pragmatic approach, particularly in the initial phases of development, allowing for flexibility in affordable housing delivery while aiming to gradually meet the higher targets as market conditions improve. Regarding additional financial contributions and site-specific challenges such as land remediation costs, these factors are taken into account within the broader viability framework. The Council remains open to reviewing and adjusting planning policies and contributions as necessary to support sustainable development and address viability concerns. Therefore, while immediate achievement of the 50% target may face practical challenges, the Council's approach ensures that development remains viable and progressively aligns with the affordable housing goals set forth. | | | |
| **SP H2: Affordable housing** | Warmerdam & Co (Crews Hill) Ltd acknowledges the importance of affordable housing but raises concerns about the feasibility of the 50% affordable housing requirement in Policy H2 for the Crews Hill area. They highlight that while Policy H2 sets a target of 50% affordable housing for greenfield sites like Crews Hill, the '2023 Whole Plan – Viability Update' by HDH Planning & Development indicates that development at Crews Hill is currently only marginally viable. They note that the viability assessment shows that the Residual Value for Crews Hill is below the Benchmark Land Value (BLV) and only slightly above the Existing Use Value (EUV), classifying it as 'amber' or marginal in terms of viability. Given this, they argue that a flexible approach should be taken to ensure that development remains viable, especially in the early stages. Warmerden & Co also suggests that the Council should review competing development costs such as Section 106 contributions, Community Infrastructure Levy (CIL) rates, and costs associated with potentially contaminated land at Crews Hill. They support the release of Crews Hill from the Green Belt for sustainable development but stress the need for the plan to be both effective and deliverable throughout the plan period, in line with National Planning Policy Framework (NPPF) guidelines. | Comments noted. The '2023 Whole Plan – Viability Update' justifies that greenfield sites, particularly in higher-value areas of the Borough, can support substantial levels of affordable housing, up to 50%, due to their higher residual values compared to urban sites. Despite current marginal viability at Crews Hill, these sites have the potential to achieve and exceed the 50% target as market conditions improve. The report acknowledges the sensitivity of viability assessments to market changes, anticipating that improved conditions will enhance financial viability. Policy H2 incorporates the Viability Tested Route (VTR) to address site-specific viability issues, allowing developers to negotiate affordable housing levels based on realistic assessments. This flexible approach ensures the policy remains adaptable while striving for high affordable housing targets. The viability update accounts for development costs, including Section 106 contributions, CIL rates, and land remediation, supporting the feasibility of higher affordable housing on greenfield sites, aligning with the Local Plan's long-term goals for a sustainable and inclusive community at Crews Hill. | No | 01730 | Warmerdam & Co (Crews Hill) Ltd |
| **SP H2: Affordable housing** | Fairview consider sufficient flexibility should be included within Policy H2 to allow for any viability challenges arising from certain sites to provide for a lower amount, when demonstrated as necessary. This could include an ability for a variation to the specified requirement of 50% social/affordable rent, and 50% intermediate housing to allow schemes to reflect market conditions. They agree a viability trigger is sensible to faciliate market changes to not stifle development. They believe that this Policy should have greater flexibility in regards to the trigger clause. For example, if a site is to provide 40% affordable housing and the desired aim of 20% BNG then this should not trigger the VTR. BNG is outlined in Draft Policy D1, as a priority for infrastructure delivery alongside a range of other delivery types. They therefore suggest that if three or more key pieces of infrastructure as set out by Policy D1 then the Site should not be subject to the VTR route as the Site itself will aim to provide a suitable level of infrastructure. They suggest further amendments to the policy to increase flexibility in its application. | Comments noted. The Council is committed to working collaboratively with stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01746 | Fairview New Homes |
| **SP H2: Affordable housing** | The Home Builders Federation (HBF) finds Part 3 of the policy unsound because it is ineffective. While they support the draft policy's acknowledgment of the need for flexibility in the tenure mix of affordable housing, they believe it should allow for even greater flexibility given the current financial and regulatory challenges faced by registered providers. HBF suggests that if an applicant offers half of the dwellings in a scheme as affordable homes, the Council should favorably consider the proposed tenure mix, including options like discounted market sale and shared ownership homes. | Enfield's Housing Needs Assessment sets out a clear need for more affordable rented accomodation. There is a balance to be struck between meeting the housing needs of residents and ensuring scheme viability. The policy is deemed sufficiently flexible to reflect this balance and therefore no change is necessary. | No | 01851 | Home Builders Federation |

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| **SP H2: Affordable housing** | Better Homes outlines significant concerns about the Enfield Local Plan (ELP) with regard to affordable housing and housing mix, particularly in relation to family-sized homes. Their analysis reveals that the ELP relies heavily on a housing mix that suggests 61% of all new homes should have three or more bedrooms, based on the Local Housing Needs Assessment 2020 (LHNA). However, this figure does not adequately account for the needs of concealed households, students, under-occupiers, and the aging population, which could skew the actual demand for larger homes. Their report argues that using a lower percentage (around 44% or less) for family-sized homes would more accurately reflect the needs of the community, potentially leading to a higher viability for affordable housing delivery. The current approach, which emphasizes larger homes, may reduce the overall delivery of affordable housing by making development schemes less financially viable. Additionally, their report critiques the financial viability of strategic sites like Chase Park and Crews Hill, which are expected to deliver a significant portion of the borough's family-sized housing. The report suggests that the high proportion of large homes proposed for these sites, coupled with substantial infrastructure costs, could undermine the delivery of affordable housing and overall development viability. Their recommendations include revisiting the housing mix to better align with actual community needs, particularly by incorporating the needs of concealed households and downsizers, and ensuring that financial assessments for strategic sites fully account for infrastructure costs and realistic housing mixes. These changes are proposed to make the ELP more consistent with the London Plan and to improve the soundness of the overall strategy . | Comments noted. The Council appreciate the detailed comments on the Council's Housing Topic Paper. Setting the aspirational housing mix in the Enfield Local Plan (ELP) is a policy decision informed by comprehensive evidence. The Local Housing Needs Assessment (LHNA) provided crucial insights before the Census 2021 data was available. Given the methodological differences and quality considerations in the 2021 Census data, particularly the disparity in "number of rooms" definitions from 2011, it was not appropriate to base housing mix policies solely on this data. This approach ensures our housing policies remain robust and effective. For further details, the ELP Spatial Strategy and Overall Approach Topic Paper, along with the Enfield Housing Topic Paper 2024, provide a comprehensive foundation for our housing targets, prioritizing brownfield development while ensuring that limited Green Belt releases are justified and necessary to meet the borough's comprehensive housing needs. | No | 01708 | Better Homes Enfield |
| **SP H2: Affordable housing** | Better Homes Enfield critiques the Enfield Local Plan (ELP), focusing on housing targets, the proposed housing mix, and the delivery of affordable housing. The report argues that the ELP's housing targets are excessively high and not aligned with the London Plan 2021, leading to unnecessary proposals for Green Belt development. It suggests that the ELP should focus on utilizing brownfield and urban sites to meet housing needs without encroaching on the Green Belt. Additionally, the report criticizes the proposed housing mix, which heavily emphasizes large family-sized homes. This approach, it argues, does not accurately reflect the actual needs of the community and could undermine the financial viability of developments, thus reducing the delivery of affordable housing. To address these concerns, the report recommends that the ELP reassess its housing targets to better align with the London Plan and prioritize brownfield sites over Green Belt land. It also suggests reevaluating the housing mix to reduce the emphasis on large family homes and better cater to the needs of concealed households, students, and downsizers. Furthermore, the report calls for a more thorough assessment of the viability of strategic sites like Chase Park and Crews Hill, ensuring that the proposed levels of affordable housing are realistic and achievable within the plan period. These recommendations aim to ensure that the ELP is more aligned with regional planning guidelines while effectively addressing local housing needs and protecting the Green Belt. | Comments noted. The housing targets set in the ELP are informed by a comprehensive analysis of both local and regional housing needs. The Spatial Strategy and Overall Approach Topic Paper outlines that these targets were developed in alignment with the strategic goals of the London Plan 2021, which requires a significant increase in housing supply across London to address the capital’s ongoing housing crisis. The ELP recognizes that meeting these targets necessitates a balanced approach that includes optimizing the use of brownfield sites while also considering limited Green Belt release in areas where "exceptional circumstances" justify such development. This approach ensures that Enfield can meet its housing needs while also protecting the majority of its Green Belt. Regarding the housing mix, the ELP is designed to be flexible and responsive to the diverse needs of the borough’s population. The Spatial Strategy emphasizes the importance of providing a range of housing types and sizes to cater to different demographic groups, including families, single-person households, and older residents. The proposed housing mix reflects a careful consideration of demographic trends and the need to create sustainable communities. Moreover, the Plan includes robust mechanisms to ensure the viability of developments, particularly in strategic sites like Chase Park and Crews Hill, where infrastructure needs and developer contributions have been thoroughly assessed. These measures are intended to ensure that the ELP not only meets its housing targets but does so in a way that is sustainable, financially viable, and aligned with the broader strategic objectives of both Enfield and Greater London. This balanced approach ensures that the ELP addresses local housing needs while maintaining the character of Enfield and protecting its environmental assets. | No | 01708 | Better Homes Enfield |
| **SP H2: Affordable housing** | Better Homes Enfield critiques the Enfield Local Plan (ELP) by arguing that the Plan's housing target of 34,710 homes is excessively high and not aligned with the London Plan 2021, which sets a minimum requirement of 18,271 homes for Enfield. The critique suggests that the ELP should aim to deliver around 28,454 homes through the development of brownfield and urban sites, thereby avoiding the need for Green Belt development. The document also questions the proposed housing mix, which emphasizes large family-sized homes, arguing that this does not align with the actual needs of the community, including concealed households and an aging population that would benefit more from smaller units. To address these concerns, the Better Homes Enfield recommends that the ELP should | Comments noted. The housing targets set in the ELP are informed by a comprehensive analysis of both local and regional housing needs. The Spatial Strategy and Overall Approach Topic Paper outlines that these targets were developed in alignment with the strategic goals of the London Plan 2021, which requires a significant increase in housing supply across London to address the capital’s ongoing housing crisis. The ELP recognizes that meeting these targets necessitates a balanced approach that includes optimizing the use of brownfield sites while also considering limited Green Belt release in areas where "exceptional circumstances" justify such development. This approach ensures that Enfield can meet its housing needs while also protecting the majority of its Green Belt. | No | 01708 | Better Homes Enfield |

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| | reassess its housing targets to focus on brownfield sites and lower its reliance on Green Belt land. It also suggests adjusting the housing mix to prioritize smaller units, which would better meet the needs of the community and improve the viability of affordable housing delivery. Additionally, the document calls for more detailed viability assessments for strategic sites like Chase Park and Crews Hill, ensuring that infrastructure costs and realistic housing needs are fully considered, and that there is sufficient engagement with stakeholders to ensure these projects are deliverable. These recommendations aim to make the ELP more consistent with regional planning guidelines while ensuring it effectively meets local housing needs. | Regarding the housing mix, the ELP is designed to be flexible and responsive to the diverse needs of the borough's population. The Spatial Strategy emphasizes the importance of providing a range of housing types and sizes to cater to different demographic groups, including families, single-person households, and older residents. The proposed housing mix reflects a careful consideration of demographic trends and the need to create sustainable communities. Moreover, the Plan includes robust mechanisms to ensure the viability of developments, particularly in strategic sites like Chase Park and Crews Hill, where infrastructure needs and developer contributions have been thoroughly assessed. These measures are intended to ensure that the ELP not only meets its housing targets but does so in a way that is sustainable, financially viable, and aligned with the broader strategic objectives of both Enfield and Greater London. This balanced approach ensures that the ELP addresses local housing needs while maintaining the character of Enfield and protecting its environmental assets. | | | |
| **SP H2: Affordable housing** | Better Homes Enfield critiques the Enfield Local Plan (ELP) with a particular focus on Policy H2, which addresses affordable housing. While the group supports the aim of increasing affordable housing, especially social rent homes, they argue that the policy as drafted is unsound due to significant concerns about the financial viability of delivering 50% affordable housing on strategic sites like Chase Park and Crews Hill. The 2023 Whole Plan Viability Update suggests that these sites may struggle to meet the affordable housing targets and infrastructure contributions required by the policy. The critique highlights inconsistencies between the policy and its supporting evidence, as well as a lack of detailed financial assessments and insufficient consultation with landowners, which could undermine the deliverability of these sites. To address these issues, Better Homes Enfield recommends conducting thorough financial assessments for Chase Park and Crews Hill, with input from key stakeholders, to ensure that the affordable housing targets and infrastructure contributions are realistic and achievable. Additionally, they suggest modifying Policy H2 to align more closely with national planning guidelines, clarifying whether the 50% affordable housing target is based on gross or net additional homes, and adjusting the split between social rent and intermediate housing to better reflect local needs. These changes aim to make Policy H2 more effective, justified, and consistent with national policy, ensuring the ELP can deliver on its affordable housing commitments without compromising the viability of key development sites. | Comments noted. The Enfield Housing Topic Paper 2024 outlines the borough's strategic approach to meeting its affordable housing needs, emphasizing the importance of delivering a mix of housing types and tenures to address the diverse needs of Enfield's population. The target of 50% affordable housing, particularly on strategic sites such as Chase Park and Crews Hill, reflects the Council's commitment to addressing the acute need for affordable housing, especially social rent homes. The policy is informed by a thorough assessment of housing needs, which considers the demographic trends and socio-economic factors impacting the borough. The Paper supports the policy's ambition by demonstrating the high demand for affordable housing and justifying the need to set ambitious targets to meet this demand over the plan period. Regarding concerns about the financial viability of these targets, the Enfield Viability Update provides a comprehensive analysis that supports the deliverability of the 50% affordable housing target, even on challenging sites like Chase Park and Crews Hill. While the Update acknowledges that these sites may face higher infrastructure and development costs, it also identifies mechanisms for mitigating these challenges, such as phased delivery, public sector funding, and grant support. The Viability Update emphasizes that with careful planning and stakeholder engagement, including ongoing collaboration with landowners and developers, these strategic sites can meet the affordable housing targets without compromising overall viability. The Council is committed to refining the master plans for these sites, ensuring that the infrastructure requirements and financial contributions are realistic and aligned with the broader objectives of the Local Plan.<br><br>This response demonstrates that the affordable housing targets in Policy H2 are both necessary and achievable, supported by robust evidence and a clear strategy for delivery, ensuring that the Enfield Local Plan meets the housing needs of the borough while maintaining financial viability. | Yes | 01708 | Better Homes Enfield |
| **SP H2: Affordable housing** | The Enfield Society argues that the policy aiming for at least 50% affordable housing at 'Chase Park' and Crews Hill is unjustified based on the Whole Plan Viability Review by HDH Ltd. This review suggests a maximum of 40% affordable housing at Crews Hill due to significant financial contributions required for infrastructure, compensation, and abnormal costs. The Society believes that these financial constraints may lead to a downward revision of affordable housing targets, thus undermining the policy's effectiveness in delivering affordable housing. Additionally, the term "genuinely" affordable housing is not recognized by national or London Plan policies and should be clarified or removed. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as | No | 01794 | Enfield Society |

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| | | East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | | | |
| **DM H3: Housing mix and type** | The NHS London Healthy Urban Development Unit welcomes the policy's commitment to providing minimum levels of larger and family units to prevent cramped and poor-quality accommodation. They suggest allowing flexibility to adapt to changing demand and market conditions during the plan period. They also recommend ensuring all standards, not just space standards, are adhered to by adding the following wording: "All forms of self-contained living accommodation, including the conversion of single dwellings into flats, will be required to, and where possible, exceed the internal and external space standards and amenity standards set out in the London Plan and the Nationally Described Space Standard." | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **DM H3: Housing mix and type** | Enfield's Housing Needs Assessment (2020) highlights a significant increase in median house prices in Enfield, from £114,000 in 2000 to £319,000 in 2019, making homes over 13 times the average annual earnings. The Hadley Wood Neighbourhood Plan indicates a distinct local market with nearly 70% of homes having four or more bedrooms and average sales prices exceeding £1.24m in 2018. The Duchy of Lancaster recognises that the site (RUR.02) offers an opportunity to address local demographic needs by providing a mix of housing types, including smaller family homes and downsizing options, along with affordable housing, ensuring quality and sustainability. | Comments noted. The Council appreciate the support and comments from the Duchy of Lancaster regarding the Draft Local Plan and the site at Camlet Way. The strategic allocation of housing sites, including RUR.02, is guided by robust evidence and a comprehensive understanding of local housing needs, as detailed in the Site Allocation Topic Paper, Exceptional Circumstances Topic Paper, and ELP Spatial Strategy and Overall Approach. The early delivery of Camlet Way within the first five years will indeed bolster our housing supply and help meet the accrued deficit. The Council welcome further engagement and a statement of common ground to ensure the successful delivery of this important site. | No | 01672 | Duchy of Lancaster |
| **DM H3: Housing mix and type** | The Duchy of Lancaster emphasizes that the Hadley Wood Neighbourhood Plan identifies a skew towards larger homes, with almost 70% having four or more bedrooms. A key objective of the plan is to provide smaller family homes and downsizing options. The site will be instrumental in meeting this objective by offering the type and size of family housing needed by the local community. | Comments noted. The Council appreciate the feedback from the Duchy of Lancaster on Site Allocation RUR.02. The Enfield Local Housing Needs Assessment (2020) and Housing Topic Paper (2024) justify our approach, emphasizing the critical need for new housing and addressing affordability issues. The Hadley Wood Neighbourhood Plan's objective to provide smaller family homes aligns with our strategy for the site, ensuring it meets local housing needs effectively. The Council acknowledge the importance of this site in contributing to Enfield's housing targets and addressing the shortfall in housing land supply. Further engagement and refinement of plans will ensure the site's successful development. | No | 01672 | Duchy of Lancaster |
| **DM H3: Housing mix and type** | McCarthy and Stone note a contradiction between Policy H3 and Policy DE13 in the Enfield Local Plan regarding the standards for accessible housing. Policy H3 requires at least 10% of new dwellings to meet the M4(3) wheelchair accessible dwelling standard, while Policy DE13 mandates that 10% of units should be wheelchair accessible or easily adapted to meet the M4(2) standard. They argue that these policies are contradictory and need clarification. Additionally, they highlight that according to national guidance, policies for wheelchair accessible homes (M4(3)) should only apply to dwellings where the local authority allocates or nominates a resident. They suggest either amending Policy H3 to reflect this or deleting paragraphs 3, 4, and 5 of Policy H3, as these requirements are already addressed in Policy DE13. | The feedback regarding the accessible housing standards outlined in Policies H3 and DE13 is noted. The council acknowledge the identified contradiction between these policies and the need for clarification. In line with national guidance, the council will amend Policy H3 to ensure it specifically applies to dwellings where the local authority is responsible for allocating or nominating residents. This amendment will align Policy H3 with Policy DE13 and national standards, eliminating any inconsistency. The council appreciate their input and are committed to ensuring the Local Plan is clear, consistent, and effectively supports the delivery of accessible housing in Enfield. Further discussions with stakeholders like McCarthy and Stone will continue to be invaluable in refining our policies. | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |
| **DM H3: Housing mix and type** | Wolden Garden Centre raises concerns about the viability of development in Crews Hill, particularly in the early phases. They argue that the current requirements for housing mix (i.e., 40% family housing) may hinder early development. They support the overall vision for Crews Hill but suggest that more flexibility in housing mix requirements would help ensure that development is viable and progresses in a timely manner. They propose amending Policy H3 to allow the 40% family housing requirement to be met as an average across the entire Crews Hill Placemaking Area rather than on a site-by-site basis. Greater Flexibility: They recommend adopting a more flexible approach to housing mix requirements to improve viability, particularly in the early phases of development, ensuring that land comes forward for development more readily. | Comments noted. The Housing Topic Paper justifies the plan's balanced approach to housing mix, emphasizing the importance of providing family housing while allowing for flexibility based on site-specific conditions. The proposal to average the 40% family housing requirement across the Crews Hill Placemaking Area aligns with the Plan's aim to ensure a diverse housing supply without compromising viability. The Viability Update recognizes that early phases of development may face viability challenges. The Local Plan includes mechanisms for flexibility, ensuring that housing mix requirements can be adjusted to maintain economic feasibility.<br>This approach ensures that the Local Plan remains both viable and effective, supporting the timely development of the Crews Hill area while meeting broader housing goals. | No | 01887 | Wolden Garden Centre Ltd |

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| **DM H3: Housing mix and type** | Wolden Garden Centre raises concerns on the requirement that 40% of affordable housing units should be family housing, which could impact the viability of early-phase developments in Crews Hill. They argue that the rigid application of this housing mix requirement may hinder the financial viability of developments, particularly near Crews Hill station, where higher density and smaller units may be more appropriate. They propose amending the policy to apply the 40% family housing requirement as an average across the entire Crews Hill Placemaking Area rather than on a site-by-site basis. This would allow for greater flexibility and improve the viability of developments, especially in early phases near the station. | Comments noted. The Housing Topic Paper emphasizes the importance of providing a mix of housing types, including family units, to meet diverse needs. However, it also supports flexibility to ensure that developments can adapt to specific site conditions, especially in early phases near transit hubs like Crews Hill. In terms of viability, the Crews Hill Topic Paper and Enfield Viability Update both acknowledge the challenges in ensuring development viability in areas like Crews Hill. The Viability Update, in particular, supports a flexible approach to housing mix requirements, allowing developers to adjust targets based on economic feasibility while maintaining the overall policy goals. The Enfield Local Plan's approach to housing mix in Crews Hill is flexible enough to accommodate economic realities while still aiming to meet broader housing objectives. By allowing for an average of the 40% family housing requirement across the entire area, rather than site-by-site, the Plan ensures that developments remain viable and deliverable, especially in early phases. | No | 01887 | Wolden Garden Centre Ltd |
| **DM H3: Housing mix and type** | Vistry Group supports the flexibility in draft policy H3 regarding site context, location, physical characteristics, viability, and the need to optimize housing delivery. However, they question requiring the same unit size mix (20% two-bedroom, 30% family housing) for both market and affordable housing. The Local Housing Needs Assessment (2020) shows differing needs: more 3-4 bedroom market homes and more 2-3 bedroom affordable homes. Vistry suggests the policy should differentiate unit mix by tenure, as the current local plan does, to better address specific housing needs and market conditions. | Comments noted. The council's strategy is justified and aligns with the NPPF by ensuring that the right homes are delivered in the right places within the Borough, taking into account site-specific contexts. Policy H3 in Enfield's Local Plan prioritises 3-bedroom units and aims for a balanced housing mix to meet diverse local needs. The Enfield Housing Topic Paper (2024) supports this approach, highlighting the importance of providing various housing types for different demographics to create inclusive, sustainable communities. This policy is informed by up-to-date housing needs assessments and market conditions. | Yes | 01897 | Vistry Group |
| **DM H3: Housing mix and type** | Warmerdam & Co (Crews Hill) Ltd suggests modifying Point g 'ii' of Policy H3, which requires that for affordable housing on publicly owned sites and Green Belt land, 20% of units must be two bedrooms and 40% must be family housing as defined by the London Plan. They propose changing this to: "For affordable housing schemes on publicly owned sites and areas released from the Green Belt, a minimum of 20% of units should be two bedrooms, while 40% should meet the London Plan definition of family housing, as an average across the entire Crews Hill Placemaking Area." This adjustment aims to enhance development viability, particularly in the early phases of the Crews Hill development. They argue that sites close to the station, which are more suited to higher-density development, might be better served with a lower proportion of family units. In contrast, areas further from the station could provide a higher proportion of family units to meet the overall 40% target. Warmerden & Co supports the long-term vision of creating a sustainable community at Crews Hill but emphasizes that the plan must remain viable and deliverable throughout the development period, in line with National Planning Policy Framework (NPPF) standards. | Comments noted. The 'Enfield Local Housing Needs Assessment (2020)' highlights a significant need for family-sized homes across the Borough, particularly in areas like Crews Hill. The assessment identifies a strong demand for larger, family-oriented housing to address growing family needs. Therefore, maintaining the Policy H3 requirement of 40% family housing for affordable schemes remains crucial for meeting these identified needs. The '2023 Whole Plan – Viability Update'recognises that greenfield sites, including Crews Hill, have the potential to support higher levels of affordable housing due to generally higher residual values. This supports the feasibility of adhering to the 40% family housing requirement. The update acknowledges that development viability is influenced by various factors, but greenfield sites are positioned to accommodate ambitious housing targets. The flexibility of the Viability Tested Route (VTR) within Policy H3 allows for site-specific adjustments without compromising overall policy objectives. While the viability update indicates that development near the station might be more challenging, it does not justify reducing the overall family housing percentage. Instead, the VTR allows for adjustments on a case-by-case basis to address specific viability concerns. Reducing the family housing requirement in one area could undermine the broader objective of delivering sufficient family homes across the entire CHPA. Maintaining the 40% family housing requirement supports the goal of creating a diverse and sustainable community, as outlined in the Enfield Local Plan and the Crews Hill Topic Paper. This approach ensures that the community is not only economically viable but also meets long-term social and demographic needs. While Warmerden & Co's proposal aims to enhance early-phase viability, the existing policy framework, supported by the Local Housing Needs Assessment and Viability Update, provides a comprehensive approach to balancing housing needs and development viability. The 40% family housing target remains essential to fulfilling identified needs and ensuring a sustainable, inclusive | No | 01730 | Warmerdam & Co (Crews Hill) Ltd |

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| | | community at Crews Hill. The VTR within Policy H3 provides necessary flexibility to address site-specific challenges while upholding the overall policy objectives. | | | |
| **DM H3: Housing mix and type** | Fairview note their commitment to the delivery of family housing, but highlight the need for this to be subject to viability calculations. However, they state that Land South of Enfield Road is able to provide family homes, with gardens and high-quality open space in line with this Policy. | Comments noted. The Council is committed to working collaboratively with stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01746 | Fairview New Homes |
| **DM H3: Housing mix and type** | Better Homes outlines significant concerns about the Enfield Local Plan (ELP) with regard to affordable housing and housing mix, particularly in relation to family-sized homes. Their analysis reveals that the ELP relies heavily on a housing mix that suggests 61% of all new homes should have three or more bedrooms, based on the Local Housing Needs Assessment 2020 (LHNA). However, this figure does not adequately account for the needs of concealed households, students, under-occupiers, and the aging population, which could skew the actual demand for larger homes. Their report argues that using a lower percentage (around 44% or less) for family-sized homes would more accurately reflect the needs of the community, potentially leading to a higher viability for affordable housing delivery. The current approach, which emphasizes larger homes, may reduce the overall delivery of affordable housing by making development schemes less financially viable. Additionally, their report critiques the financial viability of strategic sites like Chase Park and Crews Hill, which are expected to deliver a significant portion of the borough's family-sized housing. The report suggests that the high proportion of large homes proposed for these sites, coupled with substantial infrastructure costs, could undermine the delivery of affordable housing and overall development viability. Their recommendations include revisiting the housing mix to better align with actual community needs, particularly by incorporating the needs of concealed households and downsizers, and ensuring that financial assessments for strategic sites fully account for infrastructure costs and realistic housing mixes. These changes are proposed to make the ELP more consistent with the London Plan and to improve the soundness of the overall strategy . | Comments noted. The Council appreciate the detailed comments on the Council's Housing Topic Paper. Setting the aspirational housing mix in the Enfield Local Plan (ELP) is a policy decision informed by comprehensive evidence. The Local Housing Needs Assessment (LHNA) provided crucial insights before the Census 2021 data was available. Given the methodological differences and quality considerations in the 2021 Census data, particularly the disparity in "number of rooms" definitions from 2011, it was not appropriate to base housing mix policies solely on this data. This approach ensures our housing policies remain robust and effective. For further details, the ELP Spatial Strategy and Overall Approach Topic Paper, along with the Enfield Housing Topic Paper 2024, provide a comprehensive foundation for our housing targets, prioritizing brownfield development while ensuring that limited Green Belt releases are justified and necessary to meet the borough's comprehensive housing needs. | No | 01708 | Better Homes Enfield |
| **DM H3: Housing mix and type** | Better Homes Enfield critiques the Enfield Local Plan (ELP), focusing on housing targets, the proposed housing mix, and the delivery of affordable housing. The report argues that the ELP's housing targets are excessively high and not aligned with the London Plan 2021, leading to unnecessary proposals for Green Belt development. It suggests that the ELP should focus on utilizing brownfield and urban sites to meet housing needs without encroaching on the Green Belt. Additionally, the report criticizes the proposed housing mix, which heavily emphasizes large family-sized homes. This approach, it argues, does not accurately reflect the actual needs of the community and could undermine the financial viability of developments, thus reducing the delivery of affordable housing. To address these concerns, the report recommends that the ELP reassess its housing targets to better align with the London Plan and prioritize brownfield sites over Green Belt land. It also suggests reevaluating the housing mix to reduce the emphasis on large family homes and better cater to the needs of concealed households, students, and downsizers. Furthermore, the report calls for a more thorough assessment of the viability of strategic sites like Chase Park and Crews Hill, ensuring that the proposed levels of affordable housing are realistic and achievable within the plan period. These recommendations aim to ensure that the ELP is more aligned with regional planning guidelines while effectively addressing local housing needs and protecting the Green Belt. | Comments noted. The housing targets set in the ELP are informed by a comprehensive analysis of both local and regional housing needs. The Spatial Strategy and Overall Approach Topic Paper outlines that these targets were developed in alignment with the strategic goals of the London Plan 2021, which requires a significant increase in housing supply across London to address the capital's ongoing housing crisis. The ELP recognizes that meeting these targets necessitates a balanced approach that includes optimizing the use of brownfield sites while also considering limited Green Belt release in areas where "exceptional circumstances" justify such development. This approach ensures that Enfield can meet its housing needs while also protecting the majority of its Green Belt. Regarding the housing mix, the ELP is designed to be flexible and responsive to the diverse needs of the borough's population. The Spatial Strategy emphasizes the importance of providing a range of housing types and sizes to cater to different demographic groups, including families, single-person households, and older residents. The proposed housing mix reflects a careful consideration of demographic trends and the need to create sustainable communities. Moreover, the Plan includes robust mechanisms to ensure the viability of developments, particularly in strategic sites like Chase Park and Crews Hill, where infrastructure needs and developer contributions have been thoroughly assessed. These measures are intended to ensure that the ELP not only meets its housing targets but does so in a way that is sustainable, financially viable, and aligned with the broader strategic objectives of both Enfield and Greater London. This balanced approach ensures that the ELP addresses local housing needs while maintaining the character of Enfield and protecting its environmental assets. | No | 01708 | Better Homes Enfield |
| **DM H3: Housing mix and type** | Better Homes Enfield critiques the Enfield Local Plan (ELP) by arguing that the Plan's housing target of 34,710 homes is excessively high and not aligned with the London Plan 2021, which sets a minimum requirement of 18,271 homes for | Comments noted. The housing targets set in the ELP are informed by a comprehensive analysis of both local and regional housing needs. The Spatial Strategy and Overall Approach Topic Paper outlines that these targets were | No | 01708 | Better Homes Enfield |

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| | Enfield. The critique suggests that the ELP should aim to deliver around 28,454 homes through the development of brownfield and urban sites, thereby avoiding the need for Green Belt development. The document also questions the proposed housing mix, which emphasizes large family-sized homes, arguing that this does not align with the actual needs of the community, including concealed households and an aging population that would benefit more from smaller units. To address these concerns, the Better Homes Enfield recommends that the ELP should reassess its housing targets to focus on brownfield sites and lower its reliance on Green Belt land. It also suggests adjusting the housing mix to prioritize smaller units, which would better meet the needs of the community and improve the viability of affordable housing delivery. Additionally, the document calls for more detailed viability assessments for strategic sites like Chase Park and Crews Hill, ensuring that infrastructure costs and realistic housing needs are fully considered, and that there is sufficient engagement with stakeholders to ensure these projects are deliverable. These recommendations aim to make the ELP more consistent with regional planning guidelines while ensuring it effectively meets local housing needs. | developed in alignment with the strategic goals of the London Plan 2021, which requires a significant increase in housing supply across London to address the capital's ongoing housing crisis. The ELP recognizes that meeting these targets necessitates a balanced approach that includes optimizing the use of brownfield sites while also considering limited Green Belt release in areas where "exceptional circumstances" justify such development. This approach ensures that Enfield can meet its housing needs while also protecting the majority of its Green Belt. Regarding the housing mix, the ELP is designed to be flexible and responsive to the diverse needs of the borough's population. The Spatial Strategy emphasizes the importance of providing a range of housing types and sizes to cater to different demographic groups, including families, single-person households, and older residents. The proposed housing mix reflects a careful consideration of demographic trends and the need to create sustainable communities. Moreover, the Plan includes robust mechanisms to ensure the viability of developments, particularly in strategic sites like Chase Park and Crews Hill, where infrastructure needs and developer contributions have been thoroughly assessed. These measures are intended to ensure that the ELP not only meets its housing targets but does so in a way that is sustainable, financially viable, and aligned with the broader strategic objectives of both Enfield and Greater London. This balanced approach ensures that the ELP addresses local housing needs while maintaining the character of Enfield and protecting its environmental assets. | | | |
| **DM H3: Housing mix and type** | Better Homes Enfield critiques the Enfield Local Plan (ELP), particularly challenging the proposed housing strategy and the inclusion of Green Belt sites for development. The group argues that the ELP's housing targets are excessively high, projecting 34,710 homes, which significantly exceeds the London Plan's minimum requirement of 18,271 homes. They contend that the borough can meet and even surpass these targets by fully optimizing brownfield sites, which could deliver up to 39,019 homes without the need to develop on Green Belt land. The critique strongly opposes the release of high-functioning and historically significant Green Belt sites like Chase Park for development, arguing that these areas are poorly suited due to their limited access to public transport and amenities. The group recommends that the ELP should focus on maximizing the potential of brownfield sites and revising its housing mix to better align with the actual needs of Enfield's population, particularly in terms of family-sized homes. They urge the removal of Green Belt development proposals from the ELP, emphasizing that the borough can achieve its housing goals within existing urban areas while preserving the Green Belt. | Comments noted. The housing targets set in the ELP are informed by a comprehensive analysis of both local and regional housing needs. The Spatial Strategy and Overall Approach Topic Paper outlines that these targets were developed in alignment with the strategic goals of the London Plan 2021, which requires a significant increase in housing supply across London to address the capital's ongoing housing crisis. The ELP recognizes that meeting these targets necessitates a balanced approach that includes optimizing the use of brownfield sites while also considering limited Green Belt release in areas where "exceptional circumstances" justify such development. This approach ensures that Enfield can meet its housing needs while also protecting the majority of its Green Belt. Regarding the housing mix, the ELP is designed to be flexible and responsive to the diverse needs of the borough's population. The Spatial Strategy emphasizes the importance of providing a range of housing types and sizes to cater to different demographic groups, including families, single-person households, and older residents. The proposed housing mix reflects a careful consideration of demographic trends and the need to create sustainable communities. Moreover, the Plan includes robust mechanisms to ensure the viability of developments, particularly in strategic sites like Chase Park and Crews Hill, where infrastructure needs and developer contributions have been thoroughly assessed. These measures are intended to ensure that the ELP not only meets its housing targets but does so in a way that is sustainable, financially viable, and aligned with the broader strategic objectives of both Enfield and Greater London. This balanced approach ensures that the ELP addresses local housing needs while maintaining the character of Enfield and protecting its environmental assets. | Yes | 01708 | Better Homes Enfield |
| **DM H3: Housing mix and type** | Better Homes Enfield critiques the Enfield Local Plan (ELP), particularly Policy H3, which addresses housing mix. While the group supports the goal of increasing the supply of affordable family homes, they argue that the current draft of Policy H3 is unsound and not in conformity with the London Plan 2021. They highlight that the Local Housing Needs Assessment (LHNA) 2020, which informs the policy, fails to adequately consider under-occupancy rates and the needs of specific groups, such as students, downsizers, and concealed households. The group suggests that alternative scenarios from the LHNA, which indicate a greater need for two-bedroom properties and accessible housing, should be incorporated into the ELP, especially considering Enfield's aging population and high rates of under-occupancy.<br><br>Additionally, the group points out the absence of specific policies on Houses in | Comments noted. The housing mix outlined in Policy H3 is based on a comprehensive analysis of local housing needs, as detailed in the Enfield Housing Topic Paper 2024. The policy is informed by the Local Housing Needs Assessment (LHNA) 2020, which has been carefully reviewed and updated to ensure it reflects the current and projected needs of Enfield's population. While Better Homes Enfield highlights the potential for under-occupancy and the needs of specific groups like downsizers and students, the Housing Topic Paper acknowledges these factors and incorporates a balanced approach to housing mix. The ELP's focus is on providing a diverse range of housing types, including family-sized homes, which are essential for maintaining sustainable communities and supporting families in Enfield. This approach is aligned with the broader strategic objectives of the London Plan 2021, which emphasizes the need for a variety of housing options to meet the needs of all demographic groups in the borough. | Yes | 01708 | Better Homes Enfield |

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| | Multiple Occupation (HMOs) in the ELP, arguing that this omission makes the plan non-compliant with the London Plan 2021. They recommend that the ELP include clear policies that recognize the role of HMOs in meeting local housing needs, set standards for HMO conversions, and ensure high-quality living conditions. They also suggest maintaining the Article 4 Direction, which limits HMO conversions without planning permission, to manage the cumulative impact of such developments. These changes are necessary to ensure the ELP aligns with regional planning guidelines and better addresses the diverse housing needs of Enfield's population. | Regarding the role of Houses in Multiple Occupation (HMOs), the ELP recognizes the importance of providing a range of housing options, including HMOs, as part of a comprehensive housing strategy. The Spatial Strategy and Overall Approach Topic Paper highlights the need to address various housing needs, including those of students, young professionals, and low-income households who may rely on HMOs. The Council is committed to ensuring that HMOs are of high quality and meet the necessary standards for living conditions. The ELP incorporates policies that support the sustainable growth of HMOs while managing their impact on local communities, in line with the London Plan's guidelines. This includes maintaining the Article 4 Direction to regulate HMO conversions and ensuring that any new developments or conversions are consistent with the overall planning strategy for the borough. The council asserts that Policy H3 and the broader housing strategy in the ELP are both sound and justified, based on thorough evidence and strategic planning, ensuring that the housing needs of Enfield's diverse population are met in a balanced and sustainable manner. | | | |
| **DM H3: Housing mix and type** | The Enfield Society contends that the Local Plan's reference to an "appropriate mix of dwelling types and size" per the Local Housing Needs Assessment (2020) is inconsistent with the London Plan, which treats London as a single housing market area and does not mandate individual borough housing needs assessments. They argue that Enfield's approach of emphasizing larger homes (3- and 4-bedrooms) in Green Belt areas like Crews Hill and Chase Park diverges from other boroughs' practices and risks significant harm to historic landscapes. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **DM H4: Small sites and small housing development** | The GLA's response points out that the LP2021 small sites target is 3,530 homes from 2019 to 2029, with a forward target of 4,236 homes for 2029-2041. However, the Housing Topic Paper anticipates only 2,715 units for the latter period. The GLA encourages a more positive approach to increase small site deliveries, in alignment with Policy H2 of LP2021. | Comments noted. The Council acknowledges the Mayor's initiative to incentivize small site delivery and ensures alignment with national planning guidelines. Paragraph 72 of the NPPF supports realistic windfall allowances, and Enfield's updated evidence justifies its proposed windfall allowance beyond the outdated London SHLAA 2017 data. Policy H4 reflects Enfield's commitment to small site growth, aiming for 353 new homes annually. To address concerns, the Council proposes a minor modification to the monitoring framework to enhance identification and monitoring of small site deliveries, ensuring alignment with growth objectives and maintaining transparency and accountability. | Yes | 00120 | Greater London Authority (GLA) |
| **DM H4: Small sites and small housing development** | In part 2a we recommend that the criteria 'sites with good public transport accessibility (e.g. PTAL 3-6)' is amended to avoid subjective terms like good or bad so that it reads 'sites with a PTAL of 3 – 6'. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM H4: Small sites and small housing development** | The Home Builders Federation (HBF) acknowledges that the London Plan targets 3,530 homes in Enfield on sites of a quarter hectare or less by 2028/29. They note that Enfield expects to deliver 3,544 homes on such sites, aligning with the London Plan, plus an additional 1,897 homes on identified sites, totaling 5,441 homes over the 22-year plan period. This supports the national policy requirement for 10% of housing on small sites. HBF finds the Council's planning for completions on small sites—379 dwellings per annum (dpa) for 2019/20 to 2021/22 and 281 dpa for subsequent years—reasonable and consistent with historic trends and windfall assumptions. They acknowledge the Council's confidence in meeting the target of 3,544 homes on small sites. | Support Noted | No | 01851 | Home Builders Federation |
| **DM H4: Small sites and small housing development** | The Home Builders Federation (HBF) finds Part 1b of the policy ineffective. While they generally welcome the criteria for encouraging small site developments, they believe the specified 800m radius from a train station or district/town centre boundary is too narrow. HBF recommends extending this radius to 1 km to better align with policies encouraging active travel. This extension would make walking or | The radius is based on that provided in London Plan Policy H2. This is considered a sound approach and to be in conformity with the London Plan. Therefore no change is needed for soudnness. | No | 01851 | Home Builders Federation |

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| | cycling more feasible for most people and increase potential development locations, thereby enhancing housing supply. They suggest this radius should apply to all development sizes, not just small sites. | | | | |
| **DM H4: Small sites and small housing development** | The Hadley Wood Neighbourhood Forum objects to Policy H4: Small Sites in the New Enfield Local Plan, arguing that the policy is neither sound nor evidence-based. The policy fails to align with the strategic goals of "sustainable growth" and "good growth" by encouraging development within 800 metres of rail stations, even in areas with low public transport accessibility (PTAL 0 & 1) and inadequate local infrastructure. The Forum criticizes the policy for treating all 21 rail and underground stations in Enfield uniformly, without considering the distinct needs and characteristics of different localities, such as Enfield Town (PTAL 6), Hadley Wood (PTAL 0 & 1), and Winchmore Hill (PTAL 2). The Forum also highlights the policy's failure to distinguish between small brownfield sites and residential gardens, contrary to the National Planning Policy Framework (NPPF) and London Plan policies. They suggest that housing development and intensification should focus on small brownfield sites with good public transport accessibility, proximity to urban centers, and adequate local infrastructure. A revised wording for Policy H4 is proposed to reflect these concerns. | The Council acknowledges the Hadley Wood Neighbourhood Forum's concerns regarding Policy H4: Small Sites. The council's approach is justified and set out in the Enfield Housing Topic Paper (2024) which supports the need for context-sensitive policies, recognizing that not all areas near rail stations are equally suitable for intensified development due to varying transport accessibility and infrastructure. The Council agrees that distinctions between brownfield sites and residential gardens should be clearer and will consider the Forum's suggested modifications to ensure Policy H4 better aligns with sustainable growth objectives and local conditions. | No | 01669 | Hadley Wood Neighbourhood Planning Forum |
| **DM H4: Small sites and small housing development** | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) acknowledges the important role of small sites in housing delivery in Enfield but argues that Policy H4 is neither legally compliant nor sound. They highlight that small sites have significantly contributed to housing delivery in recent years, yet Policy H4 fails to conform to the London Plan's requirements and lacks clarity in distinguishing between different types of small sites, such as residential gardens and brownfield sites. The policy does not adequately reflect the need for family-sized homes or community-led development and self-build opportunities as required by the National Planning Policy Framework (NPPF). The ELUWG also criticizes the Enfield Character of Growth Study as overwhelming and disproportionate, making it difficult for smaller developers to navigate. They suggest that Policy H4 be modified to better align with the London Plan and NPPF requirements, incorporating clearer definitions and ensuring the protection and provision of family-sized homes. | Comments noted. The council welcomes ENCAF's comments on Policy H4 and acknowledge their concerns around the challenges of delivering family homes on small sites. Policy H4 is considered to be in conformity with the London Plan and seek to support small site delivery, with the Character of Growth evidence setting out positive examples of neighbourhood change in Enfield. However, the council will continue to review trends in delivery from small sites through its annual monitoring work and will consider whether updates are requried to reflect sustained trends in small site delivery in Enfield. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **DM H4: Small sites and small housing development** | Better Homes Enfield critiques Policy H4 of the Enfield Local Plan (ELP), focusing on the development of small sites for housing. While acknowledging the importance of small sites in meeting housing targets, the group raises concerns about the accuracy of the ELP's projections and its alignment with the London Plan. They argue that the ELP's forecast of 6,920 homes from small sites falls short of the London Plan's minimum target of 7,766 homes, highlighting a shortfall of 846 homes. The group also points out inconsistencies in the windfall site data and suggests that the ELP underestimates the potential of small sites by not fully considering recent trends in housing delivery. Additionally, they express concerns about the potential loss of family-sized homes through conversions on small sites, emphasizing the need for stronger protections to maintain family housing, in line with the London Plan's policies. To address these issues, the group recommends that the ELP's small site housing projections be recalculated to more accurately reflect recent trends and ensure they meet or exceed the London Plan's target. They also suggest rewording Policy H4 to include specific protections for family-sized homes (3+ bedrooms) to prevent their loss through conversions on small sites, aligning the policy with the London Plan's emphasis on preserving family housing. Furthermore, they recommend clarifying definitions, such as "backland plots," and simplifying supporting documents like the Character of Growth Study to make them more accessible and proportionate to the needs of developers and the public. These changes are aimed at improving the accuracy, effectiveness, and alignment of Policy H4 with broader planning objectives. | Comments noted. The ELP's approach to small sites is informed in a comprehensive analysis of the borough's housing needs and the strategic objectives outlined in the London Plan 2021. The Enfield Housing Topic Paper 2024 details the borough's efforts to exceed the London Plan's small site housing target through a combination of identified sites, windfall allowances, and recent trends in housing delivery. While Better Homes Enfield highlights a perceived shortfall in the ELP's small site housing projections, it is important to note that the ELP aims to deliver 6,920 homes from small sites by combining completions, identified sites in the Housing and Employment Land Availability Assessment (HELAA), and projected windfall sites. This target is ambitious and reflects a realistic and sustainable approach to housing delivery, considering Enfield's unique challenges and opportunities. The ELP's strategy aligns with the London Plan's emphasis on utilizing small sites to meet housing needs while minimizing the impact on the borough's character and environment. Regarding the protection of family-sized homes, the ELP recognizes the importance of maintaining a balanced housing mix that includes adequate provision for larger family units. The Spatial Strategy and Overall Approach Topic Paper supports the careful management of small site developments to ensure they contribute positively to the borough's housing needs without compromising the supply of family-sized homes. The ELP includes policies that encourage the retention of larger homes where appropriate and promote innovative design solutions that optimize the use of small sites while preserving local character. The policy framework is designed to be flexible, allowing for the sensitive intensification of housing in a way that supports both the strategic objectives of the London Plan and the specific needs of Enfield's communities. The ELP's approach is consistent with national policy and aims to | Yes | 01708 | Better Homes Enfield |

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| | | deliver sustainable growth that meets the diverse housing needs of the borough while protecting its unique character. The council asserts that the ELP's approaach is sound and balanced to small site development and housing mix, ensuring that it aligns with regional planning goals while addressing local needs in a sustainable and responsible manner. | | | |
| **DM H4: Small sites and small housing development** | The Enfield Over 50s Forum's response to Policy H4 of the Enfield Local Plan (ELP) argues that the policy is not compliant with relevant legislation and fails to adequately address the housing needs of the borough's aging population and concealed households. They highlight that the Local Housing Needs Assessment does not account for Enfield's aging population and high number of concealed households, resulting in an unrealistic mix of housing. They suggest the policy should increase the proportion of 1–2-bedroom homes to around 55-60%, aligning with the London Plan and neighboring boroughs like Waltham Forest. Additionally, they raise concerns about accessibility standards, noting that draft policies do not meet the required standards for wheelchair accessibility and adaptability, making the policy non-compliant with the London Plan and unsound as per the National Planning Policy Framework (NPPF). | The proposed Policy H4 of the Enfield Local Plan is legally compliant and sound. The Enfield Housing Topic Paper 2024 demonstrates that the housing mix is based on a robust evidence base, including the Local Housing Needs Assessment (2020), which accounts for a broad spectrum of housing needs across the borough, including for older residents and concealed households. The Local Housing Needs Assessment specifically identifies a need for a variety of housing types, including 1-2 bedroom homes, but also emphasizes the importance of providing homes across a broader range of sizes to cater to the diverse needs of Enfield's population. Additionally, the Housing Topic Paper reflects the borough's strategic approach, which balances local demographics and market demand while ensuring compliance with the London Plan 2021. The policy appropriately aligns with Enfield's specific housing needs and the London Plan's requirements for accessible and adaptable homes. In fact, Policy DE13 and H3 in the Draft Plan address accessibility standards by requiring that 10% of homes meet M4(3) 'wheelchair user dwellings' standards, and the remainder meet M4(2) standards, as per national regulations. Given that the Local Plan has undergone rigorous testing and analysis, the Council has taken all necessary steps to ensure that Policy H4 is legally compliant, in line with the National Planning Policy Framework (NPPF), and reflective of Enfield's housing needs, including those of older residents and concealed households. Therefore, the proposed housing mix is both sound and legally robust. | No | 01765 | Enfield Over 50s Forum |
| **DM H4: Small sites and small housing development** | The Enfield Conservative Group has raised significant objections to the proposed developments in the Crews Hill area as outlined in the Enfield Local Plan. They argue that these proposals do not meet the "exceptional circumstances" required for Green Belt release according to the National Planning Policy Framework (NPPF). The group is particularly concerned about the negative impact on the natural environment and biodiversity, the urbanization of rural settings, and the loss of recreational spaces like the Crews Hill Golf Club. They also highlight the potential harm to the Sites of Importance for Nature Conservation (SINC) in the area and express concerns about the strain on the existing transportation infrastructure, noting that the current road network and public transport services are inadequate to support the proposed developments, which would likely lead to increased car dependency. In response to these issues, the Conservative Group recommends deleting the proposed developments at Crews Hill, Chase Park, and Hadley Wood from Policy SS1, along with related site allocations and policies. They suggest reinstating more restrictive policies on tall buildings and revising Policy H4 to focus solely on brownfield sites, aligning it with the guidelines set out in the London Plan. Additionally, they advocate for clearer and more precise policy language to ensure consistent application and limit the discretionary power of planning officers. These recommendations aim to protect the Green Belt, preserve the rural character of the area, and ensure that future developments are sustainable and compliant with both local and national planning policies. | The Council acknowledges the concerns regarding Green Belt development, but the proposals in the Draft Plan are supported by a robust evidence base, including a comprehensive Green Belt Review. This review identifies areas where "exceptional circumstances" exist, justifying the release of Green Belt land to meet the borough's critical housing needs. The review considered the limited availability of brownfield sites and the need to address housing pressures in a sustainable manner. The proposed developments in Crews Hill are part of a strategic approach to distribute growth across the borough while minimizing the impact on the most sensitive areas of the Green Belt. Moreover, the Draft Plan includes detailed provisions for infrastructure improvements to support these developments, particularly in areas like Crews Hill where current public transport and road networks may be inadequate. The Plan outlines strategies to enhance transport links and reduce car dependency, aligning with both local and regional planning objectives. These measures ensure that any development in Green Belt areas will be accompanied by necessary infrastructure upgrades, making the growth sustainable and reducing potential negative impacts on the local environment and communities. | No | 01670 | Cllr Skelton |
| **DM H4: Small sites and small housing development** | The Enfield Conservative Group has expressed significant concerns regarding the Draft Enfield Local Plan, particularly the proposals outlined in Policy SS1 for developments in the Cockfosters Ward. They strongly oppose the inclusion of tall buildings in the area, specifically near the Cockfosters Underground Station, arguing that such developments would disrupt the views from the Trent Park Conservation Area and fundamentally alter the suburban character of Cockfosters. The group believes that allowing buildings up to 39 meters high would transform Cockfosters from a village-like community into an environment resembling a built-up inner London town center, which they argue would be inappropriate for the area. In addition to concerns about tall buildings, the Conservative Group also | Comments noted. The Draft Local Plan was developed with a strategic and evidence-based approach, aligning with both the London Plan 2021 and the National Planning Policy Framework (NPPF). The Spatial Strategy and Overall Approach Topic Paper outlines how the Plan addresses Enfield's specific needs, including the preservation of local character while meeting housing demands. The proposals for tall buildings in Cockfosters, for instance, are carefully considered in the context of their potential impact on the area's character. The Design and Character evidence base further supports this by ensuring that any new development, including taller buildings, will be designed to complement and enhance the existing urban fabric and natural landscapes, particularly in sensitive | No | 01670 | Enfield's Conservative Group |

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| | objects to the proposed development on Green Belt land between Camlet Way and Crescent Way. They argue that this site is vital for preserving the village feel and maintaining the character of nearby Conservation Areas such as Hadley Wood and Monken Hadley. They recommend removing specific proposals related to Chase Park, Crews Hill, Hadley Wood, and the Cockfosters Station Car Park from Policy SS1 and revisiting the policy on tall buildings to ensure it aligns with preserving the area's low-rise character. They also suggest revising Policy H4 to focus solely on brownfield sites, in line with the London Plan's emphasis on utilizing previously developed land. | areas like the Trent Park Conservation Area. Regarding the Green Belt, the Council conducted a rigorous Green Belt Review as part of the plan-making process. This review identified areas where "exceptional circumstances" justify the release of Green Belt land, considering the borough's pressing housing needs and the limited availability of brownfield sites. The proposed developments in Green Belt areas, including those in Cockfosters, are part of a broader strategy to distribute growth across the borough sustainably while minimizing the impact on the most sensitive areas. The Plan includes provisions for infrastructure improvements to support these developments, ensuring they are sustainable and aligned with both local and regional planning guidelines. The Council remains committed to ongoing consultation and will consider further refinements to ensure that the Plan reflects the needs and priorities of the entire community. | | | |
| **DM H4: Small sites and small housing development** | The Group's primary concerns relate to the impact of densification and tall buildings on the area's historic and visual character, particularly around Southgate Circus, which includes the Charles Holden-designed Southgate Underground Station and the Southgate Circus Conservation Area. The Conservative Group opposes the proposed tall buildings around Southgate Circus, which could reach up to 30 meters in height. They argue that these developments would negatively impact the views and setting of Southgate's historical sites, particularly the iconic Southgate Underground Station and views from Grovelands Park. They believe that the proposed densification and tall buildings are out of character with the existing area and would harm the overall historical and visual integrity of the Southgate Circus Conservation Area. The Group recommends revisiting Policy DE6 and reinstating the more restrictive policies from the current Enfield Local Plan. They argue that this would help preserve the character and historical integrity of Southgate by preventing the development of excessively tall buildings that would be inconsistent with the area's existing low-rise architecture. They also suggest that Policy H4 should be revised to focus exclusively on brownfield sites, in line with the London Plan's guidelines. This would ensure that new housing developments do not compromise the character of established residential areas or conservation sites. They consider these objections and recommendations reflect the Group's commitment to preserving Southgate's unique historical and architectural character while still accommodating necessary development in a way that aligns with local and regional planning guidelines. | Comments noted. The Draft Enfield Local Plan has been carefully developed to balance the need for housing and economic growth with the preservation of Enfield's unique character and heritage. The Spatial Strategy and Overall Approach Topic Paper outlines that the focus on areas like Southgate for higher-density development, including taller buildings, is driven by the strategic objective to concentrate growth in locations that are well-served by public transport and existing infrastructure. Southgate, with its Underground station and surrounding amenities, is identified as a suitable location for accommodating this growth, which is necessary to meet the borough's housing needs while minimizing the impact on less developed areas, including the Green Belt. Moreover, the Plan includes provisions to ensure that any new development respects the existing character and heritage of areas like Southgate. Specifically, the design and scale of new buildings are subject to rigorous assessment to ensure they complement the historical and architectural significance of sites like the Charles Holden-designed Southgate Underground Station. The Plan aims to integrate new developments in a way that enhances the local environment, supporting both conservation and sustainable growth. | No | 01670 | Cllr Ioannou |
| **DM H4: Small sites and small housing development** | The Enfield Council Conservative Group raises significant objections to the Draft Enfield Local Plan, particularly concerning the proposed developments on Green Belt land in areas such as Chase Park, Crews Hill, and Hadley Wood. They argue that these proposals do not meet the "exceptional circumstances" required by national policy to justify encroachment on the Green Belt. The Group is concerned that the proposed changes to Green Belt boundaries could lead to urban sprawl, merging distinct communities, and negatively impacting local wildlife and newly planted areas. Additionally, they criticize the Draft Plan for not adequately exploring all brownfield site options before considering Green Belt development, and for inflating housing targets without sufficient supporting evidence. They also highlight the lack of alignment with the Mayor of London's strategy, which focuses on development within urban boundaries and protecting the Green Belt. To address these concerns, the Conservative Group recommends removing the proposed Green Belt developments from Policy SS1 to protect these areas and maintain the distinct character of Enfield. They also suggest revisiting the policies on tall buildings, advocating for the reinstatement of more restrictive guidelines from the current Local Plan to ensure new developments are in keeping with the borough's existing character. Furthermore, they propose revising Policy H4 to focus exclusively on brownfield sites, in line with the London Plan's guidelines, to avoid unnecessary Green Belt development and ensure that new housing is integrated into areas with existing infrastructure. These recommendations aim to ensure that the Local Plan promotes sustainable development while preserving Enfield's Green Belt and character. | Comments noted. The housing targets outlined in the Draft Local Plan are informed by a comprehensive analysis of Enfield's housing needs and the borough's capacity to accommodate growth. As set out in the Spatial Strategy and Overall Approach Topic Paper, these targets were established by considering local housing demand and the broader strategic objectives of the London Plan. The Plan's stepped approach to delivering new homes balances short-term and long-term growth, ensuring that Enfield meets its housing obligations within the framework of sustainable development. This strategy is aligned with the overarching goal of minimizing pressure on the Green Belt by prioritizing development in areas with existing infrastructure and public transport links, which is crucial for maintaining the borough's environmental and community character. Regarding the approach to tall buildings, the Draft Local Plan includes rigorous guidelines to ensure that new developments, including taller buildings, are integrated thoughtfully into the urban fabric. The Design and Character evidence base emphasizes that tall buildings should be located in areas where their scale can be accommodated without harming the local character, particularly in areas with strong public transport connectivity. The Plan includes specific design criteria to ensure that tall buildings contribute positively to the skyline and do not detract from the historical and architectural significance of nearby heritage assets. These guidelines ensure that tall buildings are not only a response to housing demand but also a means to enhance urban areas while preserving the unique character of Enfield. | No | 01670 | Cllr Laban |

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| **DM H4: Small sites and small housing development** | The Enfield Council Conservative Group criticizes the Draft Enfield Local Plan, highlighting the Council's poor housing development record, particularly referencing the underperformance of the Meridian Water project. They argue that this failure is being used to justify unnecessary development on Green Belt land, driven by political motivations rather than actual need. The Group believes that the Council has not fully explored alternatives to Green Belt development, such as brownfield sites, and accuses the administration of inflating housing needs to support its agenda. They also criticize the Draft Plan for being unambitious in identifying non-Green Belt areas for potential development, further exacerbating the pressure on Green Belt land. In response, the Conservative Group recommends deleting proposals for Green Belt development in areas like Chase Park, Crews Hill, and Hadley Wood from Policy SS1, as well as removing related site allocations and policies to protect these areas. They also call for the reinstatement of more restrictive policies on tall buildings to ensure new developments are in keeping with the borough's character. Additionally, they suggest revising Policy H4 to focus exclusively on brownfield sites, aligning with the London Plan’s guidelines to avoid unnecessary encroachment on the Green Belt and to integrate housing into areas with existing infrastructure. These recommendations aim to ensure that the Local Plan is legally compliant, sustainable, and reflects both local and regional priorities. | Comments noted. The housing targets and proposed developments within the Draft Local Plan are underpinned by a comprehensive evidence base that considers both local and regional needs. The Spatial Strategy and Overall Approach Topic Paper emphasizes that the Plan was developed to address the significant housing demand within Enfield, balanced against the need to protect the borough's character and environmental assets. The Plan takes a strategic approach by focusing on sustainable locations for growth, including areas with existing infrastructure and public transport, while minimizing the impact on the Green Belt. The IIA further supports this by demonstrating how the Plan’s policies have been assessed for their environmental, social, and economic impacts, ensuring that the proposed developments align with the principles of sustainable development. Regarding the use of Green Belt land, the Plan includes a thorough Green Belt Review that justifies the release of certain sites only where "exceptional circumstances" exist, in line with national policy. The decision to consider Green Belt land for development was not taken lightly; it reflects the constraints of available brownfield sites and the urgent need to meet housing targets. The IIA also provides a detailed assessment of alternative options, reinforcing that the selected sites for development, including those on Green Belt land, are the most suitable for achieving the Plan's objectives while minimizing harm to the environment and community character. | No | 01670 | Cllr Chamberlain |
| **DM H4: Small sites and small housing development** | The Enfield Conservative Group raises significant objections to the Draft Enfield Local Plan, focusing on the inadequacy of public transport infrastructure in areas such as Crews Hill, Chase Park, and Hadley Wood, where large-scale residential developments are proposed. They argue that these areas are poorly served by public transport, with existing services already at capacity. The Group emphasizes that without major improvements to public transport, new developments in these areas would likely lead to increased car dependency, traffic congestion, and environmental harm, which contradicts the principles of sustainable development. In response to these concerns, the Group recommends deleting the proposed developments in these areas from Policy SS1 and related site allocations, as they lack the necessary infrastructure to support sustainable growth. They also suggest reinstating more restrictive policies on tall buildings to ensure new developments align with the borough's existing character and infrastructure capacity. Additionally, they propose that Policy H4 should focus exclusively on brownfield sites, consistent with the London Plan’s guidelines, to prevent unnecessary Green Belt development and to ensure that new housing is built in areas with sufficient infrastructure. These recommendations aim to ensure that the Local Plan supports sustainable development while preserving Enfield's Green Belt and community character. | Comments noted. The Draft Enfield Local Plan has been developed with a comprehensive approach to address the borough's housing needs while ensuring sustainable growth. The Spatial Strategy and Overall Approach Topic Paper highlights that the Plan strategically focuses on enhancing public transport and infrastructure in key growth areas, including those identified in Crews Hill, Chase Park, and Hadley Wood. While these areas currently have lower Public Transport Accessibility Levels (PTAL), the Plan includes provisions for future infrastructure improvements, such as enhanced bus routes, cycling paths, and other transport links that will support the sustainable development of these areas over time( Enfield Council. This proactive approach is designed to mitigate potential increases in car dependency and traffic congestion, aligning with the broader goals of reducing environmental impact and promoting active travel options. Furthermore, the Design and Character evidence base ensures that any new developments, including those in areas with current transport challenges, are integrated in a way that complements the existing character and infrastructure of the borough. The Plan outlines specific design criteria to ensure that developments are appropriate in scale and impact, considering both current and future transport capabilities. The inclusion of tall buildings, where proposed, is carefully evaluated to ensure they contribute positively to the urban fabric without overwhelming the local infrastructure. The Council remains committed to ongoing consultation and refinement of the Plan, ensuring that it remains aligned with the principles of sustainable development while addressing the community's needs and preserving Enfield’s unique character. | No | 01670 | Cllr Fallart |
| **DM H4: Small sites and small housing development** | The Enfield Council Conservative Group expresses significant concerns about the Draft Enfield Local Plan, particularly its approach to Green Belt development and the proposed introduction of tall buildings in areas like Southgate. They argue that the Plan unjustifiably targets Green Belt areas for development, such as Chase Park, Crews Hill, and Hadley Wood, without fully exploring alternatives like brownfield sites. The Group believes this approach contradicts national policies designed to protect the Green Belt and could lead to unnecessary urban sprawl. | Comments noted. The Draft Local Plan has been carefully developed to address the significant housing needs within Enfield while adhering to sustainable development principles. According to the Spatial Strategy and Overall Approach Topic Paper, the Plan includes a thorough review of the Green Belt, identifying sites where "exceptional circumstances" justify the release of land. This is done to meet critical housing demands that cannot be fulfilled through brownfield sites alone. The Plan strategically focuses on minimizing the impact on the most | No | 01670 | Cllr Morreale |

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| | They also criticize the housing targets in the Plan as excessively high, not reflecting the actual population trends in London, and likely leading to developments that could harm the character of the borough. To address these concerns, the Conservative Group recommends removing the proposals for Green Belt development in the specified areas to protect these lands and maintain their distinct character. They also suggest reinstating more restrictive policies on tall buildings, as outlined in the current Local Plan, to ensure new developments are in line with the borough's existing character and scale. Additionally, they propose revising Policy H4 to focus exclusively on brownfield sites, consistent with the London Plan's guidelines, to avoid unnecessary Green Belt development and better integrate new housing into areas with existing infrastructure. These recommendations aim to ensure that the Local Plan supports sustainable development while preserving Enfield's Green Belt and community identity. | sensitive areas by directing growth toward locations that can accommodate development while preserving the essential functions of the Green Belt, such as preventing urban sprawl and maintaining the character of the borough's distinct communities. Regarding the introduction of tall buildings, the Design and Character evidence base ensures that any new developments, including those involving taller structures, are designed to complement the existing urban fabric and preserve the character of areas like Southgate. The Plan includes stringent design criteria to ensure that taller buildings are appropriately located and do not detract from the historical and architectural significance of nearby heritage assets, such as the Southgate Underground Station. By focusing on areas with strong transport links and existing infrastructure, the Plan aims to integrate new developments in a way that enhances urban areas while safeguarding the unique character of Enfield's neighborhoods. The Council remains committed to ensuring that the Local Plan is both legally compliant and responsive to the community's needs, promoting sustainable growth that respects Enfield's Green Belt and architectural heritage. The Plan's approach to housing targets, Green Belt protection, and tall buildings demonstrates a balanced strategy aimed at fostering development that aligns with regional planning objectives and local character preservation. | | | |
| **DM H5: Supported and specialist housing** | The NHS London Healthy Urban Development Unit generally supports Policy H5 and its goal to address the specialist needs of vulnerable people in Enfield. However, they suggest an amendment to criterion 8 to better reflect situations where specialist housing is best provided as part of a larger development. They propose the following wording: "8. To ensure inclusive and mixed neighbourhoods and communities, proposals must not result in a harmful overconcentration of supported and specialist accommodation within the locality. Developments of this type should demonstrate how they ensure the long-term care of future residents is protected and maintained. This includes instances where proposals are situated adjacent to existing provision or would create an imbalance with other residential uses in the vicinity." Additionally, HUDU notes the lack of reference to dementia-friendly design and the needs of other specialist groups, such as those with mental health issues, learning difficulties, and autism, in the policy. They recommend reviewing the policy to address these concerns and welcome further discussion on how to cater to various sub-groups. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | Yes | 01872 | NHS London Healthy Urban Development Unit |
| **DM H5: Supported and specialist housing** | McCarthy and Stone express concerns regarding Policy H5, which focuses on facilitating appropriate housing for elderly and vulnerable people in Enfield. They note that while the policy promotes independent living for the elderly, it is unclear what this entails and may be interpreted as adaptable conventional housing rather than specialist housing with care. They highlight that the identified need for specialist housing for older people (both C2 and C3 use classes) in Enfield is significant, as outlined in the Enfield Local Housing Needs Assessment and other documents. McCarthy and Stone argue that the policy should more explicitly support specialist housing to meet the needs of older people, in line with the latest NPPF, which emphasizes the need to cater to different groups, including the elderly. They also object to the requirement for older persons' housing to provide affordable housing as stipulated in Policy H2 and suggest corresponding amendments to Policy H5 to align it with national policy and positively address the housing needs of older people. | The detailed feedback on Policy H5 is noted. The Council appreciate their concerns and suggestions regarding the provision of housing for older people in Enfield. The council recognize the importance of meeting the diverse housing needs of Enfield's ageing population, as highlighted in Enfield's Local Housing Needs Assessment and other supporting documents. In response to their feedback, the council will clarify Policy H5 to ensure it explicitly supports the development of specialist housing, including retirement housing, housing-with-care, and care homes, to cater to the specific needs of older residents. Regarding the requirement for older persons' housing to provide affordable housing, the council acknowledge their concerns and will review this. The Council is committed to working collaboratively with stakeholders like McCarthy and Stone to refine the plan's policies and ensure they are aligned with national guidelines and address the housing needs of all community groups effectively. The council look forward to further engagement to achieve these objectives. | No | 01867 | McCarthy & Stone Retirement Lifestyles Ltd |
| **DM H5: Supported and specialist housing** | The Home Builders Federation (HBF) argues that the policy is unsound because it is ineffective. They welcome the policy's recognition of the need for accommodation for older people, aligning with Policy H13 of the London Plan. However, they recommend strengthening the policy by referencing the Annual Borough Benchmarks for Specialist Older Persons Housing (2017-2029), which require Enfield to provide 195 units annually. HBF suggests rolling forward this annual target beyond 2028/29 and ensuring that if the benchmark is not met for | Comments noted. The Council will consider incorporating the Annual Borough Benchmarks for Specialist Older Persons Housing (2017-2029), setting a target of 195 units annually for Enfield. Additionally, we will extend this target beyond 2028/29. | Yes | 01851 | Home Builders Federation |

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| | any two consecutive years, applications for older persons' housing should be considered favorably. | | | | |
| **DM H5: Supported and specialist housing** | The Enfield Over 50s Forum highlights several concerns with Policy H5 on supported and specialist housing. They argue that the Local Plan (LP) is not legally compliant or sound due to outdated census data and unclear projections of housing needs for older and younger people with specific needs. They question the practicality of affordable housing provisions in supported housing and the lack of clarity on design standards. The forum also points out the insufficient distribution of supported housing in site allocations and the need for a comprehensive assessment of housing needs. Additionally, they seek clarification on whether care accommodation counts towards housing targets. | Comments noted. The council emphasizes that the Enfield Local Plan is legally compliant and based on up-to-date evidence. The 2020 Enfield Local Housing Needs Assessment (LHNA) highlights significant demographic changes and the need for diverse housing provisions. The Supplementary Planning Document (SPD)/masterplan for Crews Hill or Chase Park will provide clearer guidelines for affordable housing, design standards, and the distribution of supported housing, ensuring alignment with identified needs and London Plan policies. | No | 01765 | Enfield Over 50s Forum |
| **DM H9: Student accommodation** | The NHS London Healthy Urban Development Unit (HUDU) supports the policy to provide student accommodation where there is an identified need in appropriate locations. However, they emphasize the need to consider the impact on local health infrastructure due to the influx of students, primarily aged 18-22. This demographic shift could affect the use of local services, increase reliance on urgent care, and significantly raise demands on mental, acute, and sexual health services. Additionally, the preference for digital services among students may necessitate further investments in local digital health services.<br><br>HUDU also highlights the absence of specific space standards for student rooms and private amenity spaces. They caution that without these standards, developers might provide inadequate room sizes if market conditions change. They recommend referring developers to the room size standards in policy D6 of the London Plan and the National Described Space Standards, and suggest encouraging larger room sizes similar to HMO guidance to ensure adequate living conditions for students. | We welcome HUDU's comments on the draft policies. The policies are deemed to provide the appropriate balance with regard to student other specialist types of residential accomodation. It is noted that the London Plan and associated guidance already provides detailed information on space standards, with further guidance on student accomodation expected shortly.  he Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **DM H9: Student accommodation** | In part 2a we recommend that the criteria ‘are well- connected and have good levels of public transport accessibility (normally PTAL 4-6) and easily accessible by walking and cycling’ is amended to avoid subjective terms like good or bad so that it reads ‘are well-connected, have a PTAL of 4 – 6 and are easily accessible by walking and cycling’. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM H10: Traveller accommodation** | The GLA welcomes the clarity in Policy H10 of the draft ELP, which sets out the need to deliver 21 new pitches for Gypsies and Travellers over the Plan period. However, Policy H10 does not identify specific sites to meet this need. The GLA urges LBE to make provisions for these pitches alongside other housing needs in the plan. | Comments noted. The Council addresses the needs of the Gypsy, Roma, and Traveller (GRT) community through a dedicated Traveller Local Plan, as outlined in Paragraph 8.76 of the Enfield Local Plan (ELP) and the Local Development Scheme (LDS). A second Regulation 18 consultation, including proposed site allocations, is planned for autumn 2024, supported by an updated needs assessment to ensure compliance with the NPPF. The GLA is aware, the Council is also contributing to the GLA's Gypsy and Traveller Accommodation Needs Assessment (GTANA). Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **DM H10: Traveller accommodation** | National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasizes the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. | The Council acknowledges and values National Highways' response regarding its Local Plan, which aims to deliver over 33,000 homes by 2041. The council understand the need for robust Transport Assessments (TAs) for significant housing sites, particularly those near the M25 and Strategic Road Network (SRN) junctions. The council will ensure that TAs are developed in consultation with National Highways to demonstrate no residual impacts on the SRN and to guarantee that mitigation measures are fully funded. The Council is committed to promoting active travel, integrating active travel networks, and reducing car dependency to mitigate impacts on the M25. The council look forward to working closely with National Highways to support sustainable infrastructure and achieve our shared goals. | No | 01753 | National Highways Limited |

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| **DM H10: Traveller accommodation** | Hertsmere support the approach to meet the identified need for 21 pitches but questioning why this requires a separate local plan. Suggestion for small-scale private sites (5-6 pitches) to ensure better management and coexistence with settled communities. | In response to Hertsmere's objection, Enfield is proactively addressing the needs of the Gypsy, Roma, and Traveller (GRT) community with a dedicated Traveller Local Plan, as outlined in Paragraph 8.76 of the Enfield Local Plan (ELP) and the adopted Local Development Scheme (LDS). A second Regulation 18 document, including proposed site allocations, will be consulted on in autumn 2024. Enfield has commissioned an updated needs assessment to ensure compliance with the National Planning Policy Framework (NPPF) and is contributing to the GLA's Gypsy and Traveller Accommodation Needs Assessment (GTANA). Potential modifications to Policies PL10 and PL11 will provide firmer guidance and allocate specific numbers of pitches. These efforts will be documented in the Statement of Common Ground to demonstrate Enfield's commitment to meeting the accommodation needs of the G&T community. These points will be included in the Statement of Common Ground to demonstrate how Enfield is addressing the accommodation needs of the G&T community through comprehensive planning mechanisms. | No | 01924 | Hertsmere Borough Council |
| **DM H10: Traveller accommodation** | London borough of Waltham Forest (LBWF) looks forward to the cooperation with them to identify the appropriate need and facilitate necessary provision for Traveller Accommodation. | The Council acknowledges the London Borough of Waltham Forest's (LBWF) commitment to cooperate in identifying and facilitating the appropriate need and provision for Traveller Accommodation. This collaborative approach is justified based on the Enfield Housing Topic Paper 2024 and the ELP Spatial Strategy and Overall Approach Topic Paper, which provide a comprehensive framework for addressing housing needs, including for Traveller communities. The Council look forward to working closely with LBWF to ensure suitable and effective accommodation solutions are identified and implemented. | No | 02006 | London borough of Waltham Forest |
| **DM H10: Traveller accommodation** | LB Barnet and LB Enfield are awaiting the GLA London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) to determine future pitch needs for Gypsies, Travellers, and Travelling Showpeople, acknowledging that this may alter current plans. Barnet, part of the West London Alliance, has commissioned a draft assessment for 2022/23-2031/32, which the Mayor will use to inform policy. Enfield's draft Policy H10 aims to provide at least 21 pitches over the plan period. Both boroughs agree, as stated in the February 2022 Statement of Common Ground, that the GTANA and London Plan review will guide future planning for these communities. | The Council acknowledge LB Barnet's collaboration on planning for Gypsies, Travellers, and Travelling Showpeople. Enfield will be preparing a separate Traveller Local Plan, based on the most up-to-date assessment of need as detailed in our Housing Topic Paper 2024. Our draft Policy H10 commits to providing at least 21 pitches over the plan period. The council remain committed to using the findings from the GLA London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA), the London Plan review and its own evidence of need to guide future planning, ensuring the needs of these communities are effectively met. Further engagement and a Statement of Common Ground will be developed to address these strategic priorities. | No | 02091 | London borough of Barnet |
| **DM H10: Traveller accommodation** | The Enfield Society expresses concerns over the need for a separate Gypsy and Traveller Development Plan Document (DPD), stating it is unjustified. They argue that Gypsy and Traveller accommodation needs could be met without releasing Green Belt land, suggesting other Council-owned urban sites could be suitable. They highlight that Council-owned sites would allow better management and maintenance, as no Registered Social Landlords currently manage such pitches in the area, making the Council the likely manager. They question why Policy PL5 for Meridian Water lacks provisions for this accommodation. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **Chapter 9: Economy** | | | | | |
| **SP E1: Employment and growth** | The GLA welcomes the draft ELP's identification of a need for 304,000sqm of industrial and logistics space for its clarity. However, it recommends breaking down this need into specific use classes, particularly B2 and B8, for better clarity and planning. | Comments noted. The GLA's suggestion of breaking down the industrial space need into specific components, particularly distinguishing between Use Classes B2 and B8 is noted. However, many large industrial proposals typically encompass activities classified under both B2 and B8. Therefore, while providing more detailed sector information is worth considering, it may not significantly enhance clarity, given the common overlap between B2 and B8 activities. The GLA's desire to limit flexibility, particularly regarding Class E usage within or near Strategic Industrial Locations (SIL) and SIL replacement areas, is noted. However, it is crucial to recognize that policies with more flexibility, such as those for Meridian Water | No | 00120 | Greater London Authority (GLA) |

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| | | (MW), serve strategic objectives. Restricting Class E usage in these areas may impact MW initiatives and potentially hinder planned developments. While the request to tighten policies can be considered, careful consideration is needed to balance flexibility with strategic development goals. Clarification on these matters will also be included in the Statement of Common Ground, and the Council is committed to working with the GLA to ensure these concerns are adequately addressed. | | | |
| **SP E1: Employment and growth** | The GLA notes that Table 9.1 in the draft ELP outlines potential sites for industrial floorspace intensification, with a total potential net gain of 293,063sqm. It recommends that the table should specify whether the sites are designated as Strategic Industrial Locations (SILs) or Locally Significant Industrial Locations (LSISs), and the use classes they could accommodate. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP E1: Employment and growth** | The GLA's response notes that the draft ELP proposes releasing three Green Belt sites for industrial use due to limited intensification opportunities. The GLA suggests adopting a plan, monitor, and manage approach for industrial intensification, prioritising brownfield sites and phasing in more challenging sites from the middle of the Plan period. | Comments noted. The GLA recommends adopting a plan, monitor, and manage approach, focusing on brownfield sites and phasing more challenging sites later in the Plan period. However, this recommendation fails to adequately address the immediate and pressing demand for housing. Merely waiting for viability assessments equates to inaction, which does not meet the urgent housing needs of our community. The Council advocates for a proactive "plan, monitor, manage" strategy, distinct from a passive "wait and see" approach. Prioritising viability assessments over immediate need and demand risks neglecting urgent housing requirements. This approach does not recognise the critical need for timely and decisive action to address housing challenges effectively. The Council acknowledges the importance of brownfield sites and agrees that they should be prioritized for development. However, relying solely on a phased approach that prioritises viability assessments overlooks the immediate need to provide housing solutions for our community. While viability assessments are essential, they should not delay or impede progress toward meeting our housing targets and addressing pressing demand. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP E1: Employment and growth** | The London Borough of Redbridge reaffirms its support for Policy E1 and its revised target to provide a minimum of 304,000 sqm net additional industrial/logistics floorspace and 40,000 sqm net additional office floorspace, an increase from previous targets. However, Redbridge notes that the text of Policy E1 no longer includes a clear overall target for additional industrial/logistics floorspace. They recommend restoring this quantitative target, as 293,013 sqm is listed as a target in Table 9.1, indicating sufficient supply for inclusion in the policy. The supporting text of Policy E1 does clearly support the provision of 40,000 sqm net additional office space. | Comments noted. The London Borough of Enfield acknowledges the London Borough of Redbridge's support for Policy E1 and its revised targets for industrial/logistics and office floorspace. We appreciate the recommendation to restore the quantitative target for industrial/logistics floorspace within Policy E1. The overall target for additional industrial/logistics floorspace over the plan period is clearly set out in Part 4 of Policy SS1, which aligns with the strategic objectives of the Local Plan. The supporting text of Policy E1 continues to support the provision of 40,000 sqm net additional office space. | No | 01603 | London Borough of Redbridge |
| **SP E1: Employment and growth** | The London Borough of Redbridge does not consider the plan to be unsound but suggests the following change to Policy E1, which should include a clear delivery target for industrial/logistics and office floorspace. Although the overall need for employment floorspace has increased, the Local Plan currently lacks explicit targets. Redbridge recommends restoring the quantitative target, noting that 293,013 sqm of floorspace is listed in Table 9.1, which provides sufficient supply for inclusion in Policy E1, even if some smaller sites are delivered after the plan period. The supporting text already indicates support for 40,000 sqm of net additional office space. | Comments noted. The London Borough of Enfield appreciates the London Borough of Redbridge's supportive comments and suggestions regarding Policy E1. However, the Council disagree with the need for an explicit target within Policy E1 itself. The overall target for additional industrial/logistics floorspace over the plan period is clearly set out in Policy SS1. This approach ensures clarity and consistency across the Plan's strategic policies. The council remain open to further discussions to ensure mutual understanding and agreement on these matters. Clarification will be included in the Statement of Common Ground. | No | 01603 | London Borough of Redbridge |
| **SP E1: Employment and growth** | TfL reiterates that land for sustainable transport functions may be needed in locations beyond Strategic Industrial Locations (SIL), as referenced in Policy SP T1. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| **SP E1: Employment and growth** | London borough of Waltham Forest broadly supports the approach in Enfield's Economy chapter for meeting industrial and office use needs. Under the Duty to Cooperate, Waltham Forest will support Enfield on cross-boundary matters to maximise the potential of employment sites in E1: Employment and Growth and E12: Meridian Hinterlands, particularly those on the joint boundaries of the boroughs. | The Council appreciates the London Borough of Waltham Forest's (LBWF) broad support for the approach in Enfield's Economy chapter. The Council value LBWF's commitment to supporting cross-boundary matters under the Duty to Cooperate, particularly in maximizing the potential of employment sites in policies E1: Employment and Growth and E12: Meridian Hinterlands. This cooperative approach is essential for addressing the economic needs and leveraging employment opportunities in areas along our shared boundaries. The Council look forward to continuing our collaborative efforts to achieve mutual economic growth and development goals. | No | 02006 | London borough of Waltham Forest |
| **SP E1: Employment and growth** | London borough of Waltham Forest's response notes that the Plan recognises the need for exceptional circumstances for Green Belt release near key M25 junctions, primarily for the logistics sector and supporting infrastructure. However, Waltham Forest's recently adopted Local Plan does not consider the release of Green Belt or Metropolitan Open Land (MOL) to meet its identified need for industrial or employment floorspace. | The Council acknowledges Waltham Forest's approach to not releasing Green Belt or Metropolitan Open Land (MOL) to meet industrial or employment floorspace needs, as noted in their recently adopted Local Plan. Enfield's Plan recognises the need for exceptional circumstances for Green Belt release, particularly near key M25 junctions, to support the logistics sector and necessary infrastructure. Enfield's approach is justified by the evidence set out in the Spatial Strategy and Overall Approach Topic Paper. The council remain committed to working collaboratively on cross-boundary issues to achieve mutual goals. | No | 02006 | London borough of Waltham Forest |
| **SP E1: Employment and growth** | Thames Water supports the preferred strategy for industrial development in Enfield's Local Plan but emphasizes the need to allocate additional Green Belt sites for industrial use to meet future demands and provide flexibility. They highlight the Employment Land Review's identified needs and argue that further Green Belt release is justified under NPPF guidelines. Thames Water proposes specific site "Land to South of William Girling Reservoir EN3 4TG" as suitable for employment development, detailing its planning history, current use, and minimal impact on Green Belt purposes. They argue this site make a low contribution to Green Belt objectives and support urban regeneration. | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with Thames Water to support responsible development and maintain essential services. | Yes | 01681 | Thames Water |
| **SP E1: Employment and growth** | Thames Water supports the preferred strategy for industrial development in Enfield's Local Plan but emphasizes the need to allocate additional Green Belt sites for industrial use to meet future demands and provide flexibility. They highlight the Employment Land Review's identified needs and argue that further Green Belt release is justified under NPPF guidelines. Thames Water proposes specific site "Land to North West of William Girling Reservoir, Wharf Road, Columbia Wharf, Ponders End EN3 4TG" as suitable for employment development, detailing its planning history, current use, and minimal impact on Green Belt purposes. They argue this site make a low contribution to Green Belt objectives and support urban regeneration. | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with Thames Water to support responsible development and maintain essential services. | Yes | 01681 | Thames Water |
| **SP E1: Employment and growth** | Thames Water supports the preferred strategy for industrial development in Enfield's Local Plan but emphasizes the need to allocate additional Green Belt sites for industrial use to meet future demands and provide flexibility. They highlight the Employment Land Review's identified needs and argue that further Green Belt release is justified under NPPF guidelines. Thames Water proposes specific site "Land to North West of William Girling Reservoir, Wharf Road, Ponders End EN3 4TG" as suitable for employment development, detailing its planning history, current use, and minimal impact on Green Belt purposes. They argue this site make a low contribution to Green Belt objectives and support urban regeneration. | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with Thames Water to support responsible development and maintain essential services. | Yes | 01681 | Thames Water |
| **SP E1: Employment and growth** | Thames Water supports the preferred strategy for industrial development in Enfield's Local Plan but emphasizes the need to allocate additional Green Belt sites for industrial use to meet future demands and provide flexibility. They highlight the Employment Land Review's identified needs and argue that further Green Belt release is justified under NPPF guidelines. Thames Water proposes specific site "Land to South West of King George V Reservoir, Lea Valley Road E4 7PX" as suitable for employment development, detailing its planning history, | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with | Yes | 01681 | Thames Water |

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| | current use, and minimal impact on Green Belt purposes. They argue this site make a low contribution to Green Belt objectives and support urban regeneration. | Thames Water to support responsible development and maintain essential services. | | | |
| **SP E1: Employment and growth** | Thames Water finds the new Local Plan highly valuable for future water supply and wastewater infrastructure planning. They emphasize the importance of early engagement between developers and Thames Water to understand drainage, loading/flow, and water supply requirements. Infrastructure upgrades can take years, so collaboration is crucial for detailed planning and phasing of developments. Thames Water offers a free pre-planning service to help developers identify necessary upgrades, recommending that developers include this information in their planning applications for transparency. More detailed modeling may be required to refine requirements. | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with Thames Water to support responsible development and maintain essential services. | Yes | 01681 | Thames Water |
| **SP E1: Employment and growth** | Turley on behalf of Danescroft (FRELD Claverings) LLP, a property development company, recently acquired the 2.28ha Claverings Industrial Estate, which is allocated for industrial and logistics-led redevelopment due to its poor-quality buildings needing regeneration. While Danescroft supports the redevelopment principle, they identify conflicts with the Council's design principles, citing boundary inconsistencies, level differences, and unrealistic intensification targets. They suggest measuring intensification by volumetric capacity and operational yard space rather than floorspace alone and recommend modifications to the draft site allocation masterplan. Additionally, Danescroft advocates for including a full spectrum of acceptable uses in LSIS, as per London Plan Policy E4(A), and emphasizes a flexible approach to industrial intensification. | Comments noted. The Council appreciates Danescroft's support for the redevelopment of Claverings Industrial Estate and acknowledges the concerns regarding design principles. The Site Allocation Topic Paper for Regulation 19 and the Enfield Employment Topic Paper emphasize aligning site allocations with strategic growth objectives and market demands. The Council will address boundary inconsistencies and level differences and consider measuring intensification by volumetric capacity and operational yard space. The Council will enter into a Statement of Common Ground with Danescroft to address these concerns and collaboratively explore viable solutions. | No | 01747 | Danescroft (FRELD Claverings) LLP |
| **SP E1: Employment and growth** | Turley on behalf of Danescroft (FRELD Claverings) LLP supports the principle of redeveloping the site as identified in the Draft Site Allocation, they find it necessary to comment on and object to certain detailed aspects to ensure effective delivery. Modifications to Draft Policies E1, E2, and E6 are also proposed. | Noted. The Council will enter into a Statement of Common Ground with Danescroft to address these concerns and collaboratively explore viable solutions. | No | 01747 | Danescroft (FRELD Claverings) LLP |
| **SP E1: Employment and growth** | Landvest Developments Limited on behalf of their client argue that the current employment land allocations in the plan are insufficient, falling approximately 7,000 sqm short of the need identified in the Employment Land Review. They propose including their site at Junction 25 of the M25, which is suitable and available, for approximately 930 sqm of storage, logistics, and distribution floorspace to help address the employment shortfall. Further details are provided in the enclosed letter. | Comments noted. The Employment Land Review, Enfield Employment Topic Paper 2024, and the Site Allocation Topic Paper for Regulation 19 confirm that the current employment site allocations are designed to meet the identified needs within the constraints of available land and policy requirements. The shortfall of approximately 7,000 sqm is acknowledged, but the allocations seek to balance immediate needs with long-term strategic goals and site deliverability. The proposed site at Junction 25 of the M25 offers potential for additional storage, logistics, and distribution floorspace. While this site was not included in the current plan due to the extensive assessment and prioritization process detailed in the Site Allocation Topic Paper, the Council will consider additional sites and refine allocations as needed in future plan reviews and updates. | No | 01873 | Landvest Developmnets Limited |
| **SP E1: Employment and growth** | Landvest Developments Limited, representing their client, acknowledges that the Regulation 19 Local Plan is designed to enhance the borough's economic potential from 2019 to 2041, with a particular focus on the freight and logistics sector near key M25 junctions. Paragraph 9.16 of the Plan permits exceptional Green Belt release for such developments, which aligns with the location of the land adjacent to Junction 25. This site, situated strategically at a major M25 junction, is consistent with Draft Policy E1, supporting industrial and logistics uses within the Green Belt. According to the Employment Land Review, there is a need for an additional 304,000 sqm of industrial and logistics space, but the Plan only allocates 293,063 sqm, resulting in a shortfall of about 7,000 sqm. Given that intensification of existing sites is not viable, further Green Belt releases are warranted. The Junction 25 site could provide approximately 930 sqm of B8 floorspace, contributing to addressing this shortfall. Thus, this site is both suitable and achievable and should be included in the updated Local Plan. | Comments noted. The Employment Land Review, Enfield Employment Topic Paper 2024, and the Site Allocation Topic Paper for Regulation 19 confirm that the current employment site allocations are designed to meet the identified needs within the constraints of available land and policy requirements. The shortfall of approximately 7,000 sqm is acknowledged, but the allocations seek to balance immediate needs with long-term strategic goals and site deliverability. The proposed site at Junction 25 of the M25 offers potential for additional storage, logistics, and distribution floorspace. While this site was not included in the current plan due to the extensive assessment and prioritization process detailed in the Site Allocation Topic Paper, the Council will consider additional sites and refine allocations as needed in future plan reviews and updates. | No | 01873 | Landvest Developmnets Limited |
| **SP E1: Employment and growth** | To align the Draft Local Plan more closely with national and regional policies, Goodman UK Limited suggest that Chapters 7 (Design and Character) and 9 (Economy) be modified to better support the provision of a diverse range of | Comments noted. | No | 01874 | Goodman UK Limited |

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| | modern, high-quality, and accessible employment premises. Written representations with detailed recommendations are included in the enclosed Regulation 19 Consultation Stage Representation Form. | | | | |
| **SP E1: Employment and growth** | Goodman UK Limited expresses concerns over the removal of the proposed extension to the Great Cambridge Road SIL in the Draft Policies Map. They supported the extension, which would have addressed the need for additional employment land and created a buffer between their site and the Morrisons site. The current Draft Local Plan's omission of this extension is regretted, as it could impact the efficiency and future redevelopment of their site. Goodman emphasizes the need for robust boundaries and adherence to the Agent of Change principle to prevent new mixed-use developments from disrupting 24-hour industrial operations at Martinbridge and affecting future intensification. They also advocate for similar protections for other nearby sites to avoid conflicts between residential and industrial uses. | Comments noted. The Council is committed to working collaboratively with Goodman UK Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01874 | Goodman UK Limited |
| **SP E1: Employment and growth** | CCLA Investment Management (CCLA) proposes revisions to policy E1: Employment Growth for site 5 Pickett's Lock Lane, arguing that the policy should prioritize enhancing productivity and operational efficiency over merely expanding floor space or development footprint. They advocate for incorporating modern industrial needs, such as faster loading, higher ceilings, and improved infrastructure, to align with policy E4 of the London Plan and the NPPF. Their proposed revision, "1a Intensified development, where feasible, of industrial, logistics and related functions in existing employment areas, to meet modern business needs," aims to ensure the policy supports high-quality, flexible industrial spaces that can attract investment and meet future sector demands. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **SP E1: Employment and growth** | Vistry Group's response includes detailed commentary on the requirement and amount of employment floorspace within key sites, as outlined in the site-specific considerations section. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **SP E1: Employment and growth** | Prologis supports these draft policies which recognise the importance of protecting SILs and intensifying sites, together with the need to provide multistorey logistics spaces. However they idenity an inconsitency in teh area between site allocation and the policy. | Support noted. | No | 01905 | Prologis for Ravenside Retail Park |
| **SP E1: Employment and growth** | Prologis highlights an inconsistency between Policy E1, which allocates 31,500 sqm to Ravenside Retail Park (RRP), and Site Allocation SA 5.7, which specifies different figures. This inconsistency suggests the draft Local Plan may not meet the area's objectively assessed needs, potentially limiting the site's development for a multi-level logistics hub. Prologis recommends amending the policy to state a "minimum of 32,500 sqm" to align with broader Local Plan policies and support effective development. | The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01905 | Prologis for Ravenside Retail Park |
| **SP E1: Employment and growth** | Henry Boot Developments (HBD) has ongoing concerns about the Montagu Industrial Estate allocation (SA URB.30). They support site intensification but request a flexible and transparent approach. The Draft Plan's requirements for 38,600 sqm of employment floorspace are not justified and don't reflect current planning permissions, which already account for 27,268 sqm. The timeframe and infrastructure requirements are also misaligned with actual site conditions. HBD suggests updating the Draft Plan to reflect current permissions and maintaining flexibility in design principles to adapt to future needs and economic circumstances. | The Council's approach to employment allocations, including the Montagu Industrial Estate, is well-supported by thorough research and strategic planning, as detailed in the Employment Topic Paper (2024), Employment Land Review (2024), and Site Allocation Topic Paper. The Employment Land Review emphasizes the need for intensified use of existing sites to meet future demand, including Montagu Industrial Estate. The draft Local Plan's employment floorspace targets are based on extensive analysis of market demands. Utilizing the GLA's Industrial Intensification and Co-Location Study (2018), the plan promotes not only spatial intensification but also economic, process, and urban intensification for holistic site development. The Council ensures alignment of future site allocations with existing planning permissions and infrastructure requirements, promoting sustainable development. Design principles for Montagu Industrial Estate are guided by the | No | 01943 | Henry Boot Developments (HBD) |

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| | | approved Design Code, balancing high-quality industrial space creation with market adaptability. The policies are evidence-based, integrating ongoing development activities into the strategic vision, ensuring the Local Plan is practical and forward-looking. The Council will continue engaging with Henry Boot Developments and prepare a statement of common ground to address these issues and ensure the policy's soundness. | | | |
| **SP E1: Employment and growth** | Henry Boot Developments (HBD) raises concerns about the draft Plan's approach to industrial and logistics space needs. While the Plan suggests the Borough can meet these needs through urban intensification, it simultaneously proposes Green Belt releases at Rammey Marsh and Junction 24 of the M25. HBD argues that Green Belt release should be a last resort, only in exceptional circumstances, and the Plan prematurely prioritizes this without proper justification. They believe this approach risks undermining sustainable economic growth and existing employment locations. | The draft Plan's approach to accommodating industrial and logistics needs is justified based on the thorough analysis presented in Enfield's evidence base. The Employment Topic Paper (2024) highlights the borough's limited urban land availability, necessitating a balanced strategy. The Exceptional Circumstances Topic Paper outlines the justification for selective Green Belt release, emphasizing sustainable development principles. Additionally, the Integrated Impact Assessment recognises the environmental and economic rationale for this approach. Therefore, the draft Plan's provisions for industrial/logistics spaces, including selective Green Belt release, are well-founded and essential for meeting long-term needs sustainably. | No | 01943 | Henry Boot Developments (HBD) |
| **SP E1: Employment and growth** | Henry Boot Development supports the protection of employment land but challenges the draft plan's proposal to release Green Belt land for industrial and logistics needs. They argue that the Borough can meet these needs within urban areas through intensification. The release of Green Belt land should only occur under 'exceptional circumstances,' and the draft plan lacks details on necessary infrastructure improvements and justifications for early delivery. They contend that this approach is premature, lacks consideration of existing permissions, and does not ensure sustainable economic growth or address the climate emergency. | The council's approach to releasing Green Belt land for industrial and logistics development is justified by the "Exceptional Circumstances" topic paper. It identifies a significant shortfall in available employment land within urban areas and recignises the necessity for additional land to meet future demands. The paper highlights the importance of strategic sites such as Rammey Marsh and Junction 24 of the M25 in addressing this need. The release of these sites is contingent upon necessary infrastructure improvements, ensuring sustainable development and economic growth, thus meeting the requirements for exceptional circumstances as outlined in the NPPF. The Council will continue to engage with Henry Boot Developments and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01943 | Henry Boot Developments (HBD) |
| **SP E1: Employment and growth** | The Meridian Water team supports the Enfield Local Plan's aspiration to deliver 304,000 sqm of industrial and logistics floorspace from 2019 to 2041. They commend the 'brownfield first' approach, as shown in Table 9.1, and strongly endorse the strategy of maximizing the potential of urban sites for growth. | Support noted. The Council appreciates MW's overall support for the ambitions of the draft Enfield Local Plan (ELP), particularly in delivering essential housing, fostering employment growth, enhancing active travel networks, and boosting biodiversity. The Council is committed to collaborating closely with MW and other stakeholders to achieve transformational regeneration and high-quality placemaking. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01945 | Meridian Water (LBE) |
| **SP E1: Employment and growth** | Blackrock UK Property Fund's response emphasizes that relying heavily on the intensification of employment land, particularly through vertical multi-storey industrial configurations, is insufficient to meet Enfield’s employment needs over the plan period. They argue this approach does not provide a flexible supply of new premises that can accommodate the varied requirements of occupiers. They advocate for a pragmatic and flexible approach to delivering new employment floorspace throughout the plan period, rather than focusing solely on multi-storey developments for intensification. | The detailed feedback on Draft Policy E1 is weclomed. The council's approach to employment land intensification, including the use of vertical multi-storey industrial configurations, is grounded in a comprehensive and up to date evidence-based strategy. This strategy is extensively supported by documents such as the Enfield Employment Topic Paper 2024, the Employment Land Review 2024, the ELP Spatial Strategy and Overall Approach Topic Paper, and the Enfield Viability Update 2024. These documents collectively justify the need for a flexible, innovative, and sustainable approach to employment land use in Enfield. Enfield's strategy aims to maximize land use efficiency while meeting diverse occupier needs, ensuring Enfield's employment areas remain competitive and attractive. The Council recognize the importance of balancing different forms of development to accommodate various requirements and the specific challenges posed by vertical multi-storey configurations. The council remains committed to engaging with stakeholders and is open to further discussions to ensure these policies effectively support Enfield's long-term economic growth and is willing to working through a Statement of Common Ground to address any specific concerns and refine our approach as needed. | No | 01952 | Blackrock UK Property Fund |
| **SP E1: Employment and growth** | BL Logistics Investment Limited (British Land) supports Draft Strategic Policy E1, however wish that table 9.1 is amended as per changes in floorspace suggested for the site allocation | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |

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| **SP E1: Employment and growth** | The Enfield Society expresses concerns over the inclusion of Green Belt sites at Rammey Marsh (RUR.03) and East of Junction 24 (RUR.04) is not justified and contradicts the London Plan's focus on Good Growth, which emphasizes development in accessible, urban areas on previously developed land. The Enfield Society argues that releasing Green Belt land, which includes protected open spaces, goes against London Plan policies G1 and GG2. Additionally, releasing land at Junction 24 would cause significant harm to the Green Belt and damage the green gateway to the borough, affecting its attractiveness for inward investment. The need for 304,000sqm of industrial and logistics floorspace, as suggested in paragraph 9.11, is questioned by the Enfield Society, who doubts the basis and interpretation of the Employment Land Review 2023. The Enfield Society notes that the Enfield Local Plan does not specify the number of proposed jobs, but transport modelling by WSP suggests 28,721 new jobs. They argue this disproportionate job supply relative to housing is unjustified, and therefore, Green Belt employment sites SA RUR.03 and SA RUR.04 should be deleted. The argument that not releasing Green Belt sites would result in under-delivery in the plan's early years is considered unjustified by the Enfield Society, who note that the majority of supply (197,460sqm) would come from intensification of existing sites. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP E2: Promoting jobs and inclusive business** | National Highways' response highlights that around 600,000 people in the UK live in vehicles due to the housing crisis and low rental vacancy rates. While the policy requires high accessibility by sustainable transport modes, it does not address motor homes, caravans, vans, converted buses, tiny homes, or the rise in nomadic lifestyles. These could lead to increased vehicle movements on the SRN and new impacts, such as van dwellers in road laybys. They suggest estimating the growth in traveler accommodation to gauge additional traffic impacts in Enfield over the Plan period. | The Council appreciates National Highways' response highlighting the rise in nomadic lifestyles and its potential impact on vehicle movements and the Strategic Road Network (SRN). The council acknowledge the need to address accommodation types such as motor homes, caravans, vans, converted buses, and tiny homes within our Local Plan. The council will consider estimating the growth in traveler accommodation to better understand and manage additional traffic impacts in Enfield over the Plan period. The Council is committed to working with National Highways to ensure our policies support sustainable transport modes and mitigate any adverse effects on the SRN. The council look forward to further collaboration on this issue. | No | 01753 | National Highways Limited |
| **SP E2: Promoting jobs and inclusive business** | ARGO Real Estate Limited supports the Council’s commitment to fostering a growing and diversifying economy, as outlined in Draft Policy E2, and the protection of the Borough’s Strategic Industrial Land (SIL) in Draft Policy E3. However, they express concerns that Draft Policy E3’s restrictive land use criteria conflict with national policy and the London Plan by failing to account for emerging data-driven and high technology industries, such as data centers. ARGO recommends that the policy be revised to reflect the full spectrum of SIL-compliant uses outlined in the London Plan and allow for flexibility to adapt to future economic demands. Additionally, they urge Draft Policy E2 to explicitly recognize the significance of data-driven and high technology industries. | Comments noted. The Council recognizes the importance of emerging data-driven and high-technology industries. ARGO Real Estate Limited’s emphasis on flexibility for these industries aligns with the findings of the Enfield Employment Topic Paper (2024), which highlights the need to support diverse economic growth and adapt to the changing nature of industrial sectors, including high-tech and digital industries. The Council acknowledges that industrial land, such as SIL, must remain adaptable to accommodate these sectors in line with national and regional policies, including the London Plan. To support sustainable economic growth, the Council will collaborate with ARGO Real Estate Limited on a statement of common ground. This collaboration will ensure the Draft Local Plan is responsive to the evolving demands of modern economies and makes provision for a broader range of ‘SIL-compliant’ uses, such as data centers and other high-technology industries. These revisions will help future-proof Enfield’s economy, maximize industrial land use, and align the Draft Local Plan with both local needs and national strategies for economic diversification. | Yes | 01733 | ARGO Real Estate Limited |
| **SP E2: Promoting jobs and inclusive business** | ARGO Real Estate Limited emphasizes the growing demand for data centres across the UK, including in London and Enfield, due to their crucial role in supporting the digital infrastructure needed for emerging data-driven and high-technology industries. Data centres provide substantial socio-economic benefits, including supporting various sectors of the economy, enhancing productivity, and generating significant Gross Value Added (GVA). ARGO argues that the Draft Local Plan fails to adequately recognize the need for data centres and other emerging industrial sectors, focusing instead on traditional uses for industrial land. They urge the Council to revise policies E2 and E3 to plan for data-driven industries, ensuring Enfield remains competitive and aligned with national and regional policies. Not doing so is seen as a missed opportunity to position Enfield as a leader in economic and technological development. | Comments noted. The Council recognizes the importance of emerging data-driven and high-technology industries. The Council will collaborate with ARGO Real Estate Limited on a statement of common ground to ensure the Draft Local Plan aligns with national and regional policies and supports sustainable economic growth. | Yes | 01733 | ARGO Real Estate Limited |

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| **SP E2: Promoting jobs and inclusive business** | For Policy E2, ARGO Real Estate Limited suggests the following modifications they consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters: Part 3. Proposals will be supported which provide opportunities to maximise and deliver investment and job creation in the Borough through the following measures:<br>a. property development and investment to enable economic development in employment areas, major and district centres and Meridian Water, including developing the UK Innovation Corridor;<br>b. diversification of town centre activities, including making space for knowledge intensive and creative industries;<br>c. intensification of employment generating activities in SILs and LSIS, including making space for data-driven and high technology industries alongside traditional industrial, logistics and relevant sui generis uses;<br>d. improved skills and training opportunities; and<br>e. encouraging a broad-based economy which serves the needs of residents and businesses, including through supporting growth in health, education and other 'foundational economy' sectors.<br>4. Proposals will be supported which provide opportunities to promote the creation of a growing and diverse economy through ensuring availability of a range of workspaces and unit sizes, start-up space, co-working space, data centres and other emerging high technology industrial sectors, and 'grow-on' space and protecting existing floorspace and encouraging the provision of new floorspace. | Comments noted. The Council recognizes the importance of emerging data-driven and high-technology industries. The Council will collaborate with ARGO Real Estate Limited on a statement of common ground to ensure the Draft Local Plan aligns with national and regional policies and supports sustainable economic growth. | No | 01733 | ARGO Real Estate Limited |
| **SP E2: Promoting jobs and inclusive business** | Turley on behalf of Danescroft (FRELD Claverings) LLP, a property development company, recently acquired the 2.28ha Claverings Industrial Estate, which is allocated for industrial and logistics-led redevelopment due to its poor-quality buildings needing regeneration. While Danescroft supports the redevelopment principle, they identify conflicts with the Council's design principles, citing boundary inconsistencies, level differences, and unrealistic intensification targets. They suggest measuring intensification by volumetric capacity and operational yard space rather than floorspace alone and recommend modifications to the draft site allocation masterplan. Additionally, Danescroft advocates for including a full spectrum of acceptable uses in LSIS, as per London Plan Policy E4(A), and emphasizes a flexible approach to industrial intensification. | Comments noted. The Council appreciates Danescroft's support for the redevelopment of Claverings Industrial Estate and acknowledges the concerns regarding design principles. The Site Allocation Topic Paper for Regulation 19 and the Enfield Employment Topic Paper emphasize aligning site allocations with strategic growth objectives and market demands. The Council will address boundary inconsistencies and level differences and consider measuring intensification by volumetric capacity and operational yard space. The Council will enter into a Statement of Common Ground with Danescroft to address these concerns and collaboratively explore viable solutions. | No | 01747 | Danescroft (FRELD Claverings) LLP |
| **SP E2: Promoting jobs and inclusive business** | Turley on behalf of Danescroft (FRELD Claverings) LLP supports the principle of redeveloping the site as identified in the Draft Site Allocation, they find it necessary to comment on and object to certain detailed aspects to ensure effective delivery. Modifications to Draft Policies E1, E2, and E6 are also proposed. | Noted. The Council will enter into a Statement of Common Ground with Danescroft to address these concerns and collaboratively explore viable solutions. | No | 01747 | Danescroft (FRELD Claverings) LLP |
| **SP E2: Promoting jobs and inclusive business** | CCLA Investment Management (CCLA) suggests that policy E2: Promoting Jobs and Inclusive Business Growth should be revised to emphasize both the intensification of existing employment sites and the modernization of floorspace to meet contemporary industrial needs. They argue that while supporting intensification is important, it must be applied pragmatically and not as a one-size-fits-all solution. Instead, redevelopment should focus on modernizing floorspace, improving operational efficiency, and investing in infrastructure, resilience, and sustainability. CCLA's proposed amendment rewords the policy to support proposals that enhance and modernize employment locations while also providing modern industrial units. This change aims to ensure the policy is 'justified' and 'effective' in line with NPPF paragraphs 35(b) and 35(c). | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **SP E2: Promoting jobs and** | Prologis supports these draft policies which recognise the importance of protecting SILs and intensifying sites, together with the need to provide multistorey logistics spaces. | Support noted. | No | 01905 | Prologis for Ravenside Retail Park |

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| **inclusive business** | | | | | |
| **SP E2: Promoting jobs and inclusive business** | SEGRO believes Policy E2 should acknowledge that maximizing employment floorspace through site intensification may not always be practical or desirable, as noted in their response to Policy PL2. They emphasize the need to consider site-specific circumstances, character, and occupier needs, advocating for policy flexibility. SEGRO finds point 4 unclear, particularly regarding small and medium enterprises (SMEs) and co-working spaces. They note it may not always be feasible to deliver the variety of workspaces and unit sizes mentioned, depending on the site's specifics or viability constraints. | The council appreciates SEGRO's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with SEGRO and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01922 | SEGRO |
| **SP E2: Promoting jobs and inclusive business** | BL Logistics Investment Limited (British Land) supports Draft Strategic Policy E2, however they request that part 4 should be amended to make it explicit that proposals for the provision of a range of workspaces and unit sizes, start-up space, co-working space and 'grow-on' space should only be provided where it is feasible and viable to do so. | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **SP E3: Strategic Industrial Locations** | The GLA welcomes Policy E3's protection of existing SILs but suggests clarifying its role in meeting industrial capacity needs. The reconfiguration of SIL at Meridian Water through land swaps should follow a coordinated plan-led approach, clearly indicating areas for retention, substitution, and/or intensification. | Comments noted. While the GLA welcomes Policy E3's protection of existing Strategic Industrial Locations (SIL), they suggest clarifying its role in meeting industrial capacity needs and ensuring proper coordination for reconfiguration. The Council acknowledges these concerns, particularly regarding Meridian Water (MW), where challenges associated with the land swap from Locally Significant Industrial Sites (LSIS) to SIL have been identified as a weakness. The Council commits to ensuring that the MW narrative and supporting evidence are transparent about achieving a nil net loss and effectively addressing any perceived weaknesses. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **SP E3: Strategic Industrial Locations** | National Highways' response highlights that around 600,000 people in the UK live in vehicles due to the housing crisis and low rental vacancy rates. While the policy requires high accessibility by sustainable transport modes, it does not address motor homes, caravans, vans, converted buses, tiny homes, or the rise in nomadic lifestyles. These could lead to increased vehicle movements on the SRN and new impacts, such as van dwellers in road laybys. They suggest estimating the growth in traveler accommodation to gauge additional traffic impacts in Enfield over the Plan period. | The Council appreciates National Highways' response highlighting the rise in nomadic lifestyles and its potential impact on vehicle movements and the Strategic Road Network (SRN). The council acknowledge the need to address accommodation types such as motor homes, caravans, vans, converted buses, and tiny homes within our Local Plan. The council will consider estimating the growth in traveler accommodation to better understand and manage additional traffic impacts in Enfield over the Plan period. The Council is committed to working with National Highways to ensure our policies support sustainable transport modes and mitigate any adverse effects on the SRN. The council look forward to further collaboration on this issue. | No | 01753 | National Highways Limited |
| **SP E3: Strategic Industrial Locations** | TfL notes the proposal to "deliver a new mixed-use access route or corridor to establish connectivity between Meridian Water and Edmonton Marshes, as well as the wider Lee Valley Regional Park." They request further clarity on the nature of this route or corridor, as an active travel corridor would differ significantly in nature and potential impacts compared to a route designed for public transport and/or cars. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP E3: Strategic Industrial Locations** | ARGO Real Estate Limited supports the Council’s commitment to fostering a growing and diversifying economy, as outlined in Draft Policy E2, and the protection of the Borough’s Strategic Industrial Land (SIL) in Draft Policy E3. However, they express concerns that Draft Policy E3’s restrictive land use criteria conflict with national policy and the London Plan by failing to account for emerging data-driven and high technology industries, such as data centers. ARGO recommends that the policy be revised to reflect the full spectrum of SIL-compliant uses outlined in the London Plan and allow for flexibility to adapt to future economic demands. Additionally, they urge Draft Policy E2 to explicitly recognize the significance of data-driven and high technology industries. | Comments noted. The Council recognizes the importance of emerging data-driven and high-technology industries. ARGO Real Estate Limited’s emphasis on flexibility for these industries aligns with the findings of the Enfield Employment Topic Paper (2024), which highlights the need to support diverse economic growth and adapt to the changing nature of industrial sectors, including high-tech and digital industries. The Council acknowledges that industrial land, such as SIL, must remain adaptable to accommodate these sectors in line with national and regional policies, including the London Plan. To support sustainable economic growth, the Council will collaborate with ARGO Real Estate Limited on a statement of common ground. This collaboration will ensure the Draft Local Plan is responsive to the evolving demands of modern economies and makes provision for a broader range of ‘SIL-compliant’ uses, such as data centers and other high-technology industries. These revisions will help future-proof Enfield’s economy, maximize industrial land | Yes | 01733 | ARGO Real Estate Limited |

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| | | use, and align the Draft Local Plan with both local needs and national strategies for economic diversification. | | | |
| **SP E3: Strategic Industrial Locations** | ARGO Real Estate Limited emphasizes the growing demand for data centres across the UK, including in London and Enfield, due to their crucial role in supporting the digital infrastructure needed for emerging data-driven and high-technology industries. Data centres provide substantial socio-economic benefits, including supporting various sectors of the economy, enhancing productivity, and generating significant Gross Value Added (GVA). ARGO argues that the Draft Local Plan fails to adequately recognize the need for data centres and other emerging industrial sectors, focusing instead on traditional uses for industrial land. They urge the Council to revise policies E2 and E3 to plan for data-driven industries, ensuring Enfield remains competitive and aligned with national and regional policies. Not doing so is seen as a missed opportunity to position Enfield as a leader in economic and technological development. | Comments noted. The Council recognizes the importance of emerging data-driven and high-technology industries. The Council will collaborate with ARGO Real Estate Limited on a statement of common ground to ensure the Draft Local Plan aligns with national and regional policies and supports sustainable economic growth. | No | 01733 | ARGO Real Estate Limited |
| **SP E3: Strategic Industrial Locations** | ARGO Real Estate Limited supports the protection and effective use of industrial land but argues that the Council's approach to measuring intensification in Draft Policy E3 is overly simplistic. A simple comparison of existing versus proposed floorspace fails to account for underutilized sites with outdated layouts, high plot ratios, and redundant non-industrial components. ARGO suggests a more nuanced approach that considers the volumetric capacity of sites, adequate yard space for vehicle flow, and the actual use of SIL/LSIS-compliant floorspace. This would provide a more accurate measure of intensification, ensuring redevelopment can accommodate modern industrial needs without compromising operational capabilities, marketability, or viability. | Comments noted. The Council recognizes the importance of both traditional and emerging data-driven, high-technology industries in achieving sustainable economic growth. We appreciate ARGO Real Estate Limited's input on the approach to industrial intensification and acknowledge the need for a more nuanced method of measuring site utilization, particularly with respect to volumetric capacity, yard space, and actual industrial floorspace. The Council is committed to collaborating with ARGO Real Estate Limited on a statement of common ground to ensure that the Draft Local Plan reflects these considerations and aligns with national and regional policies, promoting a flexible and future-proof industrial strategy. | Yes | 01733 | ARGO Real Estate Limited |
| **SP E3: Strategic Industrial Locations** | For Policy E3, ARGO Real Estate Limited suggests the following modifications they consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters: 3. ~~General and light industrial, storage and distribution, research and development and related sui generis uses (such as wholesale markets, waste management, utilities infrastructure)~~ The land uses set out in London Plan Policy E4(A) are encouraged in SIL, alongside ancillary office use and land for sustainable transport functions. Small scale food and drink and leisure uses which meet the day-to-day needs of workers and do not adversely affect the industrial status or operation of the area will be supported. Other uses will not be supported.<br><br>4. Proposals which result in a net loss of ~~light and general industrial, storage and distribution, research and development and related sui generis floorspace~~ industrial capacity in SILs will be refused.<br><br>*Definition of industrial capacity: A site's industrial capacity can be measured by a range of parameters including its existing and proposed usable floorspace for land uses set out in London Plan Policy E4(A), volumetric capacity, and (on-site) operational yard space.*<br><br>Paragraph 9.32: The policy promotes and protects SILs for industrial-type activities set out in London Plan Policy E4(A). This includes related sui generis uses such as waste management facilities, utilities and transport depots, along with additional support facilities like office uses, provided they are ancillary in scale and function, and emerging industrial activities and sectors such as data centres, renewable energy generation and/or clean technology. It is crucial that these uses are | Comments noted. The Council recognizes the importance of emerging data-driven and high-technology industries. The Council will collaborate with ARGO Real Estate Limited on a statement of common ground to ensure the Draft Local Plan aligns with national and regional policies and supports sustainable economic growth. | Yes | 01733 | ARGO Real Estate Limited |

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| | compatible with the industrial function of SILs and do not compromise the ability of businesses to carry out intensive, round-the-clock industrial activities within SILs. | | | | |
| **SP E3: Strategic Industrial Locations** | Goodman UK Limited supports the overall direction of Draft Strategic Policy E3 (Strategic Industrial Locations) but is concerned that Part 3 of the policy does not fully align with London Plan Policy E4(A). The current policy supports a limited range of industrial uses, whereas the London Plan includes a broader spectrum of emerging industrial-related sectors and related activities essential for London's economy. Goodman UK Limited recommends rewording the policy to ensure it meets the Borough's and the capital's current and future industrial needs and aligns with the London Plan. | Comments noted. The Council is committed to working collaboratively with Goodman UK Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01874 | Goodman UK Limited |
| **SP E3: Strategic Industrial Locations** | Prologis supports these draft policies which recognise the importance of protecting SILs and intensifying sites, together with the need to provide multistorey logistics spaces. | Support noted. | No | 01905 | Prologis for Ravenside Retail Park |
| **SP E3: Strategic Industrial Locations** | SEGRO suggests Policy E3 be redrafted for flexibility and application of the planning balance, as the current approach, particularly point 4, is too rigid. They emphasize the need to consider site-specific factors, market and employment occupiers' needs, the broad range of the employment sector, and viability. SEGRO is concerned that the policy's absolute nature—resulting in either refusal or approval without flexibility—could be problematic and should be adjusted to allow for more nuanced decision-making. | The council appreciates SEGRO's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with SEGRO and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01922 | SEGRO |
| **SP E3: Strategic Industrial Locations** | Henry Boot Development welcomes the recognition in the draft Plan that 'banqueting suites' are not permitted in Strategic Industrial Locations (SIL) or Locally Significant Industrial Locations (LSIL). | No changes. | No | 01943 | Henry Boot Developments (HBD) |
| **SP E3: Strategic Industrial Locations** | The Meridian Water team welcomes the safeguarding of Strategic Industrial Locations (SIL) policy, including the reconfiguration at Meridian Hinterlands sites. They believe the proposed range of land uses—general and light industrial, storage and distribution, research and development, and related sui generis uses—aligns with London Plan Policies E4 and E5, supporting a thriving business base that meets the needs of various industrial and logistics occupiers. | Support noted. The Council appreciates MW's overall support for the ambitions of the draft Enfield Local Plan (ELP), particularly in delivering essential housing, fostering employment growth, enhancing active travel networks, and boosting biodiversity. The Council is committed to collaborating closely with MW and other stakeholders to achieve transformational regeneration and high-quality placemaking. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01945 | Meridian Water (LBE) |
| **SP E3: Strategic Industrial Locations** | Blackrock UK Property Fund supports the ongoing role of Strategic Industrial Locations (SIL) due to the need to retain and expand these areas. However, they caution against relying solely on intensification, especially vertical multi-storey industrial configurations, as these may not meet all business operational requirements. They advocate for a pragmatic and flexible approach to delivering new employment floorspace throughout the plan period, ensuring a variety of development forms are considered to meet diverse occupier needs. | The Council appreciates Blackrock UK Property Fund's support for the ongoing role of Strategic Industrial Locations (SIL). The Council recognize the importance of retaining and potentially expanding these areas to meet the diverse operational requirements of businesses. The Council's approach to intensification, including vertical multi-storey industrial configurations, is supported by comprehensive evidence, including the Employment Land Review, the Employment Topic Paper, and the Viability Update. These documents provide a detailed analysis of employment needs and the viability of different development forms. While intensification is a key strategy, the Council acknowledges the need for a flexible approach to ensure that new employment floorspace can meet the varied requirements of all occupiers. The evidence supports this balanced and pragmatic approach, ensuring that the Local Plan can effectively deliver a range of employment spaces throughout the plan period. The Council welcomes ongoing dialogue and are committed to working together with stakeholders, including through the development of Statements of Common Ground, to ensure that the Local Plan remains robust and responsive to the needs of the business community. | No | 01952 | Blackrock UK Property Fund |
| **SP E3: Strategic** | BL Logistics Investment Limited (British Land) supports Draft Strategic Policy E3, aligning it with the London Plan's focus on protecting and intensifying employment-generating uses within SIL. They recommend amending Part 3 of Policy E3 to | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment |

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| **Industrial Locations** | explicitly include Use Classes E(g), B2, B8, and Sui Generis as employment-generating uses. Additionally, they suggest allowing applications to adopt a flexible approach and apply for a composite range of employment-generating uses to meet occupier and market demands. | | | | Limited (British Land) |
| **SP E3: Strategic Industrial Locations** | The Canal and Rivers Trust noted that many organisations already use their land for burying service cables and pipes under towpaths and waterways. They suggested that new developments should be encouraged to explore similar opportunities. This potential could be referenced in the supporting text of the policy. However, any such proposals would require separate commercial agreements with the Trust. | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |
| **SP E4: Supporting offices** | National Highways' response highlights that around 600,000 people in the UK live in vehicles due to the housing crisis and low rental vacancy rates. While the policy requires high accessibility by sustainable transport modes, it does not address motor homes, caravans, vans, converted buses, tiny homes, or the rise in nomadic lifestyles. These could lead to increased vehicle movements on the SRN and new impacts, such as van dwellers in road laybys. They suggest estimating the growth in traveler accommodation to gauge additional traffic impacts in Enfield over the Plan period. | The Council appreciates National Highways' response highlighting the rise in nomadic lifestyles and its potential impact on vehicle movements and the Strategic Road Network (SRN). The council acknowledge the need to address accommodation types such as motor homes, caravans, vans, converted buses, and tiny homes within our Local Plan. The council will consider estimating the growth in traveler accommodation to better understand and manage additional traffic impacts in Enfield over the Plan period. The Council is committed to working with National Highways to ensure our policies support sustainable transport modes and mitigate any adverse effects on the SRN. The council look forward to further collaboration on this issue. | No | 01753 | National Highways Limited |
| **SP E4: Supporting offices** | Vistry Group's response includes detailed commentary on the requirement and amount of employment floorspace within key sites, as outlined in the site-specific considerations section. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **SP E4: Supporting offices** | Better Homes Enfield critiques Policy E4 of the draft Enfield Local Plan (ELP), arguing that it is not in conformity with the London Plan 2021 and lacks soundness according to national planning policies. The group emphasizes that the ELP acknowledges the risk posed by Office to Residential Permitted Development Rights (PDR) but fails to introduce an Article 4 direction to protect office spaces in key areas like Enfield Town and Southgate. Without this direction, the document argues, the plan risks encouraging more PDR conversions, which could undermine the vitality of these town centers and the overall employment strategy for the borough. Additionally, the group notes that the draft ELP does not clearly establish where and when the necessary additional office space will be delivered, particularly in major town centers, and instead allocates a large portion of the needed office space to Meridian Water, potentially neglecting the established urban centers. The document recommends several modifications to improve the draft ELP. Firstly, it suggests adding the intent to pursue an Article 4 direction to help maintain the vitality and economic prosperity of Enfield's town centers by controlling PDR conversions. Secondly, it advises that placemaking strategies and site allocations more clearly reference the specific sites required to deliver additional office capacity and ensure developers evaluate and reflect local office space needs in their planning applications. Lastly, the document highlights the need for greater consistency between the Employment Topic Paper and the draft ELP in terms of the strategy for new office provision, particularly in how it aligns with the broader goals for sustainable development and economic growth in Enfield's town centers. | Comments noted. The Council acknowledges your concerns regarding conformity with the London Plan 2021 and NPPF guidelines. The Enfield Employment Topic Paper 2024 outlines strategies to deliver the required 40,000 sq. m of additional office space, emphasizing urban centres and transport hubs. | Yes | 01708 | Better Homes Enfield |
| **SP E5: Transforming Industrial Sites** | Form submitted asking the council to refer refer to their representation letter prepared by DP9, on behalf of Joseph Homes Regeneration Limited. | Received with thanks. | No | 01875 | Joseph Homes Regeneration Limited |
| **SP E5: Transforming Industrial Sites** | Joseph Homes Regeneration Limited supports the general intent of Draft Policy E5 but finds Criterion 2a overly restrictive. They propose amending it to facilitate co-location of industrial and residential uses within LSISs, aligning with London Plan Policy E7. Joseph Homes is developing a masterplan for an LSIL site in Angel | Comments noted. The Council is committed to working collaboratively with Jpseph Homes Regeneration Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a | No | 01875 | Joseph Homes Regeneration Limited |

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| | Edmonton to deliver industrial modernization, new homes, and public benefits. They recommend amending Policy E5 to allow flexibility for large-scale masterplans that retain the site's business function and support local area visions and public benefits. | Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SP E5: Transforming Industrial Sites** | Goodman UK Limited supports the Council's encouragement of industrial intensification and efficient use of space in Draft Policy E5 but has concerns about Part 2(D) regarding the retention and relocation of existing businesses. They believe that engaging with existing businesses and negotiating leases is primarily a commercial matter outside the planning regime, with details often being commercially sensitive. The London Plan does not mandate addressing the retention or relocation of businesses for redevelopment proposals. Additionally, retaining businesses may conflict with the goal of intensification, as new multi-storey developments may not suit existing tenants' needs. Goodman UK Limited recommends rewording the policy to consider these factors and allow case-by-case exploration of business retention, aligned with each site's specific circumstances. | Comments noted. The Council is committed to working collaboratively with Goodman UK Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01874 | Goodman UK Limited |
| **SP E5: Transforming Industrial Sites** | Joseph Homes Regeneration Limited supports the general intent of Draft Policy E5 but finds Criterion 2a overly restrictive. They propose amending it to facilitate co-location of industrial and residential uses within LSISs, aligning with London Plan Policy E7. Joseph Homes is developing a masterplan for an LSIL site in Angel Edmonton to deliver industrial modernization, new homes, and public benefits. They recommend amending Policy E5 to allow flexibility for large-scale masterplans that retain the site's business function and support local area visions and public benefits. | Comments noted. The Council is committed to working collaboratively with Jpseph Homes Regeneration Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01875 | Joseph Homes Regeneration Limited |
| **SP E5: Transforming Industrial Sites** | Form submitted asking the council to refer refer to their representation letter prepared by DP9, on behalf of Joseph Homes Regeneration Limited. | Received with thanks. | No | 01875 | Joseph Homes Regeneration Limited |
| **SP E5: Transforming Industrial Sites** | CCLA Investment Management (CCLA) proposes modifications to policy E5: Transforming Industrial Sites to better reflect the need for both intensification and innovation in industrial development. They emphasize that while the draft policy focuses on intensification, it should also support new employment formats that align with the Borough's business needs. Their suggested revision aims to ensure that policy E5 is 'effective' as per NPPF paragraph 35(c) by incorporating elements such as modernized floorspace, operational efficiency, increased building height, and infrastructure investment. The proposed amendment is: “The intensification of industrial uses within SILs and LSIS through the more efficient use of space, higher plot ratios, the development of multi-storey schemes, and the assembling of sites within designated employment areas to assist with the delivery of more intensive formats will be supported, where feasible. Proposals will be supported which deliver modernized floorspace, operational efficiency; increased building height, infrastructure investment, resilience, sustainability, quality and operational flexibility (24/7 use).” | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett’s Lock Lane |
| **SP E5: Transforming Industrial Sites** | SEGRO argues that Policy E5 is too rigid, lacking flexibility and failing to consider site-specific factors and employment occupiers' needs. They warn that this could hinder the expansion of existing businesses or new employment investments in the Borough. SEGRO also highlights issues with the policy's support for business relocation, noting the practical challenges and potential delays it could cause. They suggest that the policy cannot be a "one size fits all" approach and needs to be more adaptable. | The council appreciates SEGRO's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with SEGRO and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01922 | SEGRO |
| **SP E5: Transforming Industrial Sites** | HBD raises concerns that the requirement for effective mitigation of potential negative impacts on surrounding areas contradicts the London Plan’s ‘Agent of Change’ principle and draft Plan Policy E3(5). This principle states that new developments should not compromise the operational integrity or effectiveness of Strategic Industrial Locations (SILs) or Locally Significant Industrial Locations | The Council's approach is justified, aligning with the 'Agent of Change' principle and Policy E3. The Exceptional Circumstances Topic Paper highlights the need to balance industrial activities with mitigation measures. Policy E3 ensures that new developments within or adjacent to SILs do not compromise their operational integrity, maintaining 24-hour industrial activities. This balance allows for effective | No | 01943 | Henry Boot Developments (HBD) |

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| | (LSILs), particularly their ability to operate on a 24-hour basis. This inconsistency needs to be addressed to ensure policy alignment and clarity. | mitigation of potential negative impacts while protecting the function and productivity of SILs, ensuring sustainable economic growth and adherence to both local and London Plan policies. The Council will continue to engage with Henry Boot Developments and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | | | |
| **SP E5: Transforming Industrial Sites** | Henry Boot Development's response acknowledges the requirement for effective mitigation of potential negative impacts on surrounding areas, but expresses concern that this may conflict with the London Plan's 'Agent of Change' principle and draft Plan Policy E3. Specifically, Policy E3 requires that proposals within or adjacent to Strategic Industrial Locations (SILs) should not compromise the integrity or effectiveness of these locations in accommodating industrial activities and their ability to operate on a 24-hour basis. This potential conflict highlights the need for clarity and consistency in policy application. | The Council's approach is justified, aligning with the 'Agent of Change' principle and Policy E3. The Exceptional Circumstances Topic Paper highlights the need to balance industrial activities with mitigation measures. Policy E3 ensures that new developments within or adjacent to SILs do not compromise their operational integrity, maintaining 24-hour industrial activities. This balance allows for effective mitigation of potential negative impacts while protecting the function and productivity of SILs, ensuring sustainable economic growth and adherence to both local and London Plan policies. The Council will continue to engage with Henry Boot Developments and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01943 | Henry Boot Developments (HBD) |
| **SP E5: Transforming Industrial Sites** | Blackrock UK Property Fund argues that relying heavily on vertical multi-storey industrial configurations for the intensification of employment land will not sufficiently meet Enfield's employment needs over the plan period. They advocate for a pragmatic and flexible approach to delivering new employment floorspace, accommodating various development forms to cater to diverse occupier requirements. Additionally, they note that pre-application discussions are not always feasible for urgent business needs, and such applications should be assessed on their merits without being penalized, maintaining the traditional approach of the English planning system. | The Council appreciates Blackrock UK Property Fund's support for the ongoing role of Strategic Industrial Locations (SIL). The Council recognize the importance of retaining and potentially expanding these areas to meet the diverse operational requirements of businesses. The Council's approach to intensification, including vertical multi-storey industrial configurations, is supported by comprehensive evidence, including the Employment Land Review, the Employment Topic Paper, and the Viability Update. These documents provide a detailed analysis of employment needs and the viability of different development forms. While intensification is a key strategy, the Council acknowledges the need for a flexible approach to ensure that new employment floorspace can meet the varied requirements of all occupiers. The evidence supports this balanced and pragmatic approach, ensuring that the Local Plan can effectively deliver a range of employment spaces throughout the plan period. The Council welcomes ongoing dialogue and are committed to working together with stakeholders, including through the development of Statements of Common Ground, to ensure that the Local Plan remains robust and responsive to the needs of the business community. | No | 01952 | Blackrock UK Property Fund |
| **SP E5: Transforming Industrial Sites** | BL Logistics Investment Limited (British Land) also recommends that Policy E5 should: Encourage the use of basements and mezzanines for efficient plot ratios and layouts. Promote intensification through increased job opportunities and more efficient industrial processes. Support composite industrial/logistics uses (Use Classes E(g), B2, and B8). Allow flexibility for 24-hour operations as part of intensifying employment uses. Additionally, Part 3 of Policy E5 should specify that environmental and amenity improvements should be required only when necessary, feasible, and viable. | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **DM E6: Locally Significant Industrial Sites** | LB Barnet supports Policy E6 in Enfield's draft Local Plan, which safeguards Locally Significant Industrial Sites (LSIS) for local business needs, encouraging industrial, storage, distribution, and research uses, while ensuring non-industrial proposals do not compromise business functions. Barnet recommends a design-led approach to LSIS. In Barnet's Main Modifications to their draft Local Plan, the New Southgate Opportunity Area is suggested for light industrial, Class B2, Class B8, and employment-generating sui generis uses, including waste management facilities. This area could also accommodate office and light industrial uses suitable for town centres, as long as they do not negatively impact other uses. | The Council appreciate LB Barnet's support for Policy E6, which safeguards Locally Significant Industrial Sites (LSIS) to meet local business needs. Our approach aligns with the recommendations of the 2023 Employment Land Review (ELR), which emphasizes maintaining industrial uses while adopting a design-led approach to development within LSIS. This strategy ensures that non-industrial proposals do not compromise the business function of LSIS and adhere to the agent of change principle. For further details, refer to the Enfield Employment Topic Paper 2024. The council welcome ongoing collaboration with LB Barnet to align our strategies and ensure successful implementation of our Local Plan. | No | 02091 | London borough of Barnet |
| **DM E6: Locally Significant Industrial Sites** | Turley on behalf of Danescroft (FRELD Claverings) LLP, a property development company, recently acquired the 2.28ha Claverings Industrial Estate, which is allocated for industrial and logistics-led redevelopment due to its poor-quality buildings needing regeneration. While Danescroft supports the redevelopment principle, they identify conflicts with the Council's design principles, citing boundary inconsistencies, level differences, and unrealistic intensification targets. They suggest measuring intensification by volumetric capacity and operational yard | Comments noted. The Council appreciates Danescroft's support for the redevelopment of Claverings Industrial Estate and acknowledges the concerns regarding design principles. The Site Allocation Topic Paper for Regulation 19 and the Enfield Employment Topic Paper emphasize aligning site allocations with strategic growth objectives and market demands. The Council will address boundary inconsistencies and level differences and consider measuring intensification by volumetric capacity and operational yard space. The Council will | No | 01747 | Danescroft (FRELD Claverings) LLP |

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| | space rather than floorspace alone and recommend modifications to the draft site allocation masterplan. Additionally, Danescroft advocates for including a full spectrum of acceptable uses in LSIS, as per London Plan Policy E4(A), and emphasizes a flexible approach to industrial intensification. | enter into a Statement of Common Ground with Danescroft to address these concerns and collaboratively explore viable solutions. | | | |
| **DM E6: Locally Significant Industrial Sites** | Turley on behalf of Danescroft (FRELD Claverings) LLP supports the principle of redeveloping the site as identified in the Draft Site Allocation, they find it necessary to comment on and object to certain detailed aspects to ensure effective delivery. Modifications to Draft Policies E1, E2, and E6 are also proposed. | Noted. The Council will enter into a Statement of Common Ground with Danescroft to address these concerns and collaboratively explore viable solutions. | No | 01747 | Danescroft (FRELD Claverings) LLP |
| **DM E6: Locally Significant Industrial Sites** | Joseph Homes Regeneration Limited supports the intent of Draft Policy E6 but finds Criterion 1 overly restrictive as it refuses proposals resulting in a net loss of industrial space in LSISs. They suggest amending the policy to allow masterplan-led co-location of industrial and residential uses, aligning with London Plan Policy E7. This approach would enable comprehensive redevelopment, retain the site's economic function, deliver area visions, and provide public benefits. They recommend changing the wording to support proposals under these conditions instead of outright refusal. | Comments noted. The Council is committed to working collaboratively with Jpseph Homes Regeneration Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01875 | Joseph Homes Regeneration Limited |
| **DM E6: Locally Significant Industrial Sites** | Joseph Homes Regeneration Limited supports the intent of Draft Policy E6 but finds Criterion 1 overly restrictive as it refuses proposals resulting in a net loss of industrial space in LSISs. They suggest amending the policy to allow masterplan-led co-location of industrial and residential uses, aligning with London Plan Policy E7. This approach would enable comprehensive redevelopment, retain the site's economic function, deliver area visions, and provide public benefits. They recommend changing the wording to support proposals under these conditions instead of outright refusal. | Comments noted. The Council is committed to working collaboratively with Jpseph Homes Regeneration Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01875 | Joseph Homes Regeneration Limited |
| **DM E7: Non-designated industrial sites** | The GLA's response advises that Policy E7 should reference LP2021 Policy E7 Part C, instead of E5 Part B, for proposals involving the net loss of industrial floorspace. | Comments noted. The Council acknowledges the importance of correct references in Policy E7 regarding non-designated industrial floorspace and the requirement for completing intensified industrial uses before residential components. This issue partly stems from a national policy concern. The LPA encourages Meridian Water to minimize Class E use within Strategic Industrial Locations (SIL), emphasizing that "lighter industry" does not equate to Class E use. This distinction is crucial for future planning. The Council is working with the Meridian Water team to ensure policies reflect intended objectives while maintaining flexibility for diverse industrial activities within SILs. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **DM E7: Non-designated industrial sites** | Proposals resulting in a loss of industrial type floorspace should provide evidence of at least 24 months of active marketing that demonstrates there is no current or future market demand for the site, whereas Waltham Forest's Local Plan Policy 28 Approach to Non-Designated Employment Land requires at least 12 months. | The Council acknowledges the difference in marketing requirements between its policy and Waltham Forest's Local Plan Policy 28. The plan's requirement for 24 months of active marketing before the loss of industrial floorspace is based on robust evidence set out in the Employment Topic Paper 2024 and the Employment Land Review 2024. This approach ensures a thorough evaluation of market demand, reflecting the specific economic context and industrial needs of Enfield. The Council recognize that each borough has unique circumstances and remain committed to working collaboratively. | No | 02006 | London borough of Waltham Forest |
| **DM E7: Non-designated industrial sites** | CCLA Investment Management (CCLA) recommends revisions to policy E7: Non-Designated Industrial Sites to better accommodate modern industrial requirements and economic potential. They argue that the policy should not penalize reductions in floor space if they lead to site modernization and increased productivity. Instead, the policy should consider factors such as site suitability, modern business needs, quality of floorspace, and essential infrastructure like service yards and parking. CCLA suggests deleting section 2 of the draft policy to allow for more flexible and innovative development, aligning the policy with Policy E4 of the London Plan and ensuring compliance with NPPF paragraph 35(d). | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 |

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| **DM E8: Providing for workspaces** | CCLA Investment Management (CCLA) suggests revisions to policy E8: Providing for Workspaces to better align with market demands and support the needs of expanding and larger businesses. They argue that the policy should not impose specific requirements for small or medium-sized units, as this could hinder the availability of suitable industrial space for growing businesses, potentially leading them to relocate outside London. Instead, each site should be assessed individually based on its ability to meet modern business needs. CCLA proposes amending the policy to focus on supporting the provision of affordable workspaces on appropriate sites, ensuring the policy is 'effective' in accordance with NPPF paragraph 35(c). | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **DM E8: Providing for workspaces** | Vistry Group supports the introduction of an affordable workspace policy to meet smaller business needs in the Borough, defined as at least 10% below standard market rates. However, they find the policy high-level and place too much onus on developers to demonstrate viability, provision methods, and engagement with workspace providers. Vistry suggests clearer guidance and expectations are necessary to ensure successful delivery of affordable workspace. | Comments noted. The council considers that Policy E8 in Enfield's Local Plan is justified by the Enfield Employment Topic Paper (2024), which recognises the need to support small businesses and encourage economic growth. The policy aims to provide affordable workspace to sustain and grow the local economy. By setting workspace rents at 10% below market rates, the policy helps smaller businesses thrive in Enfield, ensuring economic diversity and resilience. This approach aligns with broader objectives to create a balanced and sustainable economic environment within the borough. | Yes | 01897 | Vistry Group |
| **DM E8: Providing for workspaces** | SEGRO expresses concerns about the application of the policy requiring developments proposing more than 1,000 sqm of net additional employment floorspace to assess the viability of providing 10% as affordable workspace. They note that the policy's supporting text is not reflected in the policy itself, creating uncertainty about its application. Additionally, SEGRO highlights the lack of viability assessment in the Plan's Evidence Base and suggests including an option for payment in lieu to accommodate different site scales and operational models. | The council appreciates SEGRO's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with SEGRO and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01922 | SEGRO |
| **DM E8: Providing for workspaces** | Blackrock UK Property Fund emphasizes the need for a variety of development forms to meet occupier requirements, rather than focusing solely on multi-storey development for intensification. They argue that affordable workspaces are not always appropriate or viable and highlight that it is often unfeasible to accommodate existing occupants into new development schemes due to phasing issues. | The Council appreciates the feedback provided by Blackrock UK Property Fund. The Council's approach to ensuring a variety of development forms, including multi-storey intensification, is based on comprehensive evidence and strategic planning principles. The Employment Topic Paper (2024) outlines the necessity of a flexible yet robust strategy to meet Enfield's employment needs over the plan period. This includes accommodating a range of business requirements and operational needs while promoting sustainable and efficient use of land. The inclusion of affordable workspaces and mechanisms to support existing occupants are vital to Enfield's holistic vision for economic growth and employment retention in the borough. The Council acknowledge the complexities involved and remain committed to working collaboratively to address these challenges effectively. | No | 01952 | Blackrock UK Property Fund |
| **DM E8: Providing for workspaces** | BL Logistics Investment Limited (British Land) supports Draft Strategic Policy E8 and the need for affordable workspace. However, they believe the requirement for 10% affordable workspace, as stated in paragraph 9.49, is too high and may impact scheme viability, layout efficiency, and operational management. They suggest amending Policy E8 to specify that if a development proposes less than 10% affordable workspace, the provision should be subject to a viability assessment. | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **DM E9: Local jobs, skills and local procurement** | Development proposals of ten or more residential units or sites of 0.5 hectares should secure local employment and provide appropriate work-based training/apprenticeships through section 106 obligations. Waltham Forest's equivalent Policy 33 sets a threshold of 25 homes. | The Council appreciates Waltham Forest's feedback and acknowledges the differing thresholds between its policy and Waltham Forest's Policy 33. Enfield's threshold for developments of ten or more residential units or sites of 0.5 hectares is based on comprehensive evidence, as outlined in its Employment Topic Paper 2024. This approach is designed to maximize local employment opportunities and support workforce development in alignment with Enfield's unique economic | No | 02006 | London borough of Waltham Forest |

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| | | context. We are committed to working collaboratively with Waltham Forest to achieve mutually beneficial outcomes. | | | |
| **DM E9: Local jobs, skills and local procurement** | CCLA Investment Management (CCLA) argues that policy E9: Local Jobs, Skills and Local Procurement unjustifiably penalizes proposals that reduce existing floorspace, potentially affecting the feasibility of such schemes and diminishing Enfield's competitive edge compared to neighboring areas. They believe that the requirements for relocation of businesses, job creation elsewhere in the Borough, or financial contributions for industrial regeneration and job support, as outlined in section 2 and paragraph 9.65, are excessive and unjustified. CCLA recommends removing these penalizations to ensure the policy aligns with NPPF paragraph 35(b) and does not hinder development potential. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **DM E9: Local jobs, skills and local procurement** | SEGRO finds points 2 and a, b, and c of the policy too burdensome, potentially deterring investment rather than encouraging business space regeneration. They suggest the policy should reflect the diversity of the employment sector, accommodate different needs, and be proportionate to promote site redevelopment. SEGRO also notes that "jobs" are not easily quantifiable and calls for clarity in the policy wording. Additionally, they seek clarification on the financial contribution calculation formula outlined in Appendix D. | The council appreciates SEGRO's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with SEGRO and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01922 | SEGRO |
| **DM E9: Local jobs, skills and local procurement** | BL Logistics Investment Limited (British Land) supports Draft Strategic Policy E9 and the need for appropriate work-based training and apprenticeships. However, they believe that any site-specific employment and skills plan should be secured via a Section 106 obligation post-consent, rather than submitted with the planning application. This approach allows for necessary monitoring to ensure commitments are reasonable, achievable, and reflective of market conditions. Additionally, British Land notes that the specific requirements in paragraph 9.55 of Policy E8 for local labor, apprenticeships, and procurement from local businesses should be included in Supplementary Planning Guidance (SPG). The policy should clarify that these are targets, not mandatory requirements, and should consider the practicality and viability of delivering these measures. | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **DM E9: Local jobs, skills and local procurement** | The Home Builders Federation (HBF) argues that Part 1 of the policy is unsound and ineffective. The policy requires major developments to secure local employment and provide work-based training and apprenticeships, but it is imprecise and not aligned with the specific skills needs identified by the housebuilding industry and the CITB. HBF points out that addressing construction skills and apprenticeships is more effective at a regional level rather than confined to one borough. They highlight that housebuilders already pay an apprenticeship levy and have their own training strategies. Local policies might dissipate resources from other important planning objectives and fail to address actual skills requirements effectively. Therefore, HBF recommends deleting the policy. | Comments noted. While the council recognize the importance of addressing construction skills at a regional level, we believe local efforts also play a crucial role. The Council will review the policy to ensure it is more precise and aligned with industry needs, potentially including collaborations with regional bodies and leveraging existing housebuilders' training strategies. However, the council maintain that local initiatives are vital for supporting community development and meeting borough-specific needs. | Yes | 01851 | Home Builders Federation |
| **DM E11: Creating a smart and digitally connected Borough** | The Canal and Rivers Trust emphasizes the need to improve the environment on the eastern side of the RLN, including the towpath and Towpath Road, which is not sufficiently addressed in the Local Plan (LP). They highlight concerns about access, the potential negative impact of tall buildings, and the necessity for properly designed bridge crossings with pedestrian and cycle access. The Trust calls for the inclusion of these considerations in the policy or supporting text and suggests creating a Meridian Hinterlands SPD for a more effective redevelopment approach. They urge the Council to engage with them to ensure these improvements and protections are implemented. | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |

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| **DM E12: Meridian Hinterlands** | The GLA's response notes that Paragraph 9.77 suggests SIL in Meridian Water can accommodate lighter industrial uses, but Class E offers little protection. The GLA emphasises the need to focus on Class B uses within SIL due to their strategic importance. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | Yes | 00120 | Greater London Authority (GLA) |
| **DM E12: Meridian Hinterlands** | The GLA's response states that developments within or adjacent to SILs must not compromise industrial activities, in line with Policy E5 Part D of LP2021 and the Mayor's Agent of Change principle. Additionally, intensified industrial uses should be completed before any residential components are occupied. | Comments noted. The Council acknowledges alignment with LP2021 Policy E5 Part D and the Mayor's Agent of Change principle (Policy D13). The Council recognizes the potential SIL loss in Kenninghall within the Meridian Water masterplan, requires careful consideration. The Agent of Change principle is generally supported, but SIL boundaries need oversight, especially regarding Haringey. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **DM E12: Meridian Hinterlands** | The GLA welcomes key performance indicator 12, which monitors net changes in SIL and LSIS floorspace. However, it recommends breaking down the 50ha target into SIL and LSIS components and providing further details for Class B8 and B2 capacity. | Comments noted. The Council acknowledges the GLA's suggestion for Policy D2 to cover the entire SIL or LSIS areas consistently with LP2021 guidelines. The Council recognizes a short-term delivery gap due to current viability issues and phased Green Belt site options. The GLA's approach seems more "wait and see," which may not address short-term needs. The Council suggests further examination of masterplan scope for effective coverage. Clarification will be included in the Statement of Common Ground. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **DM E12: Meridian Hinterlands** | The GLA welcomes the clear presentation of the reconfiguration of SIL at Meridian Water. However, it notes that redesignating sites from LSIS to SIL does not represent a real gain in capacity since these sites are already in industrial use. The draft ELP should clarify the needs for Class B8 and B2 resulting from the reconfiguration. | Comments noted. The Council is happy to work with the GLA to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 00120 | Greater London Authority (GLA) |
| **DM E12: Meridian Hinterlands** | TfL welcomes the inclusion of public transport connections in response to their comments. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM E12: Meridian Hinterlands** | London borough of Waltham Forest broadly supports the approach in Enfield's Economy chapter for meeting industrial and office use needs. Under the Duty to Cooperate, Waltham Forest will support Enfield on cross-boundary matters to maximise the potential of employment sites in E1: Employment and Growth and E12: Meridian Hinterlands, particularly those on the joint boundaries of the boroughs. | The Council appreciates the London Borough of Waltham Forest's (LBWF) broad support for the approach in Enfield's Economy chapter. The Council value LBWF's commitment to supporting cross-boundary matters under the Duty to Cooperate, particularly in maximizing the potential of employment sites in policies E1: Employment and Growth and E12: Meridian Hinterlands. This cooperative approach is essential for addressing the economic needs and leveraging employment opportunities in areas along our shared boundaries. The Council look forward to continuing our collaborative efforts to achieve mutual economic growth and development goals. | No | 02006 | London borough of Waltham Forest |
| **DM E12: Meridian Hinterlands** | The Meridian Water team supports the framework outlined in Policy E13 for industrial-led regeneration in the north and east of the Meridian Water area. They appreciate the clear direction provided, with SIL reconfiguration aimed at delivering new workspaces before any residential development, resulting in a substantial net increase in employment floorspace to meet boroughwide industrial and logistics needs. They emphasize the importance of future masterplanning to ensure successful industrial/logistics operations within a mixed-use context. They also suggest that site allocations policy should reflect this masterplanning process, with indicative capacity determined through future planning to optimize brownfield site capacity in line with London Plan Policy D3. | Support noted. The Council appreciates MW's overall support for the ambitions of the draft Enfield Local Plan (ELP), particularly in delivering essential housing, fostering employment growth, enhancing active travel networks, and boosting biodiversity. The Council is committed to collaborating closely with MW and other stakeholders to achieve transformational regeneration and high-quality placemaking. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01945 | Meridian Water (LBE) |
| **DM E12: Meridian Hinterlands** | The Canal and Rivers Trust highlights the towpath as a crucial traffic-free route for walking and cycling, providing connectivity, recreational opportunities, and promoting health and well-being in line with the NPPF. They welcome the Local | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of | No | 02007 | Canal & River Trust |

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| | Plan's (LP) policies that support towpath improvements, including better connectivity, wayfinding, and bridge access. Additionally, the Trust notes the LP's encouragement of using the RLN for freight and stresses the importance of applicants/developers consulting with them on related proposals and necessary infrastructure, including any required commercial agreements. | Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **Chapter 10: Town Centres and High Streets** | | | | | |
| **SP TC1: Promoting town centres** | National Highways supports commercial and business development and expansion within existing areas or re-occupation of vacant floorspace to reduce traffic on the M25 from short and local trips. They advocate for retail activities in sustainable locations serviced by sustainable transport. They emphasize considering cumulative impacts of changes, as all town centre activities generate trips with origins and destinations. According to para 51 in the circular, if a transport assessment indicates severe residual cumulative impacts on the SRN or unacceptable safety impacts, developers must identify necessary transport improvements. They also note that primary shopping areas, often hosting high-trip attractions like medical centres and childcare venues, generate significant traffic, particularly during peak hours, and people are generally unwilling to walk or cycle to these destinations. | The Council welcomes National Highways' support for commercial and business development within existing areas and the re-occupation of vacant floorspace to reduce traffic on the M25. The council acknowledge the importance of situating retail activities in sustainable locations serviced by sustainable transport. The council will carefully consider the cumulative impacts of these changes, recognizing that all town centre activities generate trips with various origins and destinations. In alignment with paragraph 51 of the DfT Circular 02/2013, the council is committed to ensuring that transport assessments for developments identify necessary improvements if severe residual cumulative impacts on the SRN or unacceptable safety impacts are indicated. The council also recognize that primary shopping areas, often home to high-trip attractions such as medical centres and childcare venues, generate significant traffic, particularly during peak hours. The council will work collaboratively with National Highways to address these challenges and develop effective transport solutions that promote sustainable and safe travel options. | No | 01753 | National Highways Limited |
| **SP TC1: Promoting town centres** | TfL suggests amending Part 2 to read: "All development must contribute positively to placemaking in town centres, including by supporting an attractive and accessible public realm that is safe (and perceived to be safe) for all to use during the day and night time..." | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP TC1: Promoting town centres** | London borough of Waltham Forest broadly support the approach in this chapter, particularly the focus on growth and investment in Town Centres to ensure long-term vitality and viability. They are pleased with the references to urban greening and creating links to green and blue networks within town centres. Additionally, they support the sequential approach to development, management of use-classes, markets, and meanwhile uses, as well as support for co-working locations and the approach applied to delivery outside designated centres. | The Council welcomes the support from the London Borough of Waltham Forest for the approach outlined in the chapter, particularly regarding the focus on growth and investment in Town Centres. The Council appreciate their recognition of the emphasis on urban greening and creating links to green and blue networks within town centres. The support for Enfield's sequential approach to development, management of use-classes, markets, meanwhile uses, and co-working locations is highly valued. The Council look forward to continued collaboration to ensure the long-term vitality and viability of our town centres. | No | 02006 | London borough of Waltham Forest |
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| **SP TC1: Promoting town centres** | The Enfield Society supports the effort to maintain distinctive features and historic character in town centres as outlined in paragraph 1c. However, they express concern that balancing this with the growth and investment focus of paragraph 1a could lead to the development of tall buildings that may be inappropriate for Conservation Areas. This could result in harm to the historic environment, contrary to national policy and the London Plan protections. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP TC1: Promoting town centres** | The Enfield Society argues that Enfield Town has functioned effectively as a Major Town Centre under the current Core Strategy (Core Policy 6) and does not require the introduction of tall buildings to maintain its status within the town centre hierarchy. They contend that the current structure has supported the town's role successfully for many years, indicating that significant changes like tall buildings are unnecessary. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize | No | 01794 | Enfield Society |

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| | | environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | | | |
| **SP TC2: Encouraging vibrant and resilient town centres** | Savills, on behalf of Asda, supports the Placemaking Vision for Southgate as a thriving District Centre and the specific policy for Southgate, including the identification of Asda's store within the District Centre boundary. They recommend clarifying Figure 3.7 to avoid ambiguity. While supporting enhancements to the pedestrian environment and reducing surface car parks, Savills emphasizes the need for appropriate vehicular parking for food shopping. They also suggest amending Strategic Policy TC2 to include "where appropriate to do so" for Criteria 2 requirements, acknowledging that minor developments might not contribute to all policy matters. Additionally, Asda welcomes engaging with the Council on a future SPD to support the placemaking vision. | The council welcomes Asda's support of the Placemaking Vision for Southgate and the specific policy for Southgate. The council appreciate their feedback on Figure 3.7 and will ensure it is clarified to avoid ambiguity. The council acknowledge the importance of appropriate vehicular parking for food shopping and will consider this in our policies. The council will amend Strategic Policy TC2 to include "where appropriate to do so" for Criteria 2 requirements to reflect the nature of minor developments. The approach aligns with Enfield's commitment to sustainable development and community-focused planning as outlined in the ELP Spatial Strategy and Overall Approach Topic Paper. The council welcome further engagement with Asda on developing the future SPD to support our placemaking vision. | Yes | 01732 | Asda Stores Ltd |
| **DM TC3: Floorspace above commercial premises** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman's property within the development boundary, the reduction of green open space, and the conflict with Enfield's Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |
| **DM TC6: Managing the clustering of town centre uses** | This policy addresses managing clustering in Town Centres and the over-proliferation of certain use classes. It is suggested to strengthen this policy by referencing the positioning of Hot Food Takeaways in relation to each other and to schools, colleges, and youth facilities, in line with the London Plan Policy E9 and Waltham Forest's Local Plan Policy 51 Hot Food Takeaways. | The Council appreciates the suggestion from the London Borough of Waltham Forest regarding the management of clustering in Town Centres and the positioning of Hot Food Takeaways. We recognize the importance of considering their location in relation to schools, colleges, and youth facilities and will review and consider incorporating these elements to strengthen our policy and better address community health and wellbeing concerns. The Council look forward continued collaboration on this matter. | No | 02006 | London borough of Waltham Forest |
| **DM TC6: Managing the clustering of town centre uses** | McDonald's expresses disappointment that Policy TC6, which limits the concentration of hot food takeaways, remains unchanged. They argue this approach is unsound as it contradicts the National Planning Policy Framework (NPPF) by not supporting economic growth and lacking relevant evidence. They claim the policy is not positive, justified, effective, or consistent with national policy. McDonald's asserts that the policy fails to define "overconcentration" and does not provide evidence of existing concentration levels, making it unjustifiable and potentially stifling economic development. | Comments noted. The restrictions on hot food takeaways in Policy TC6 are designed to address specific local health and community concerns, supported by evidence in our town centres and high streets studies. The policy aligns with Enfield's commitment to promoting healthier lifestyles and creating balanced, vibrant commercial areas. Our evidence base highlights the importance of managing the mix of uses in town centres to prevent overconcentration and its potential negative impacts on public health and the vitality of high streets. These measures are in line with the NPPF's emphasis on creating healthy, inclusive communities. | No | 01917 | McDonald's Restaurants Ltd |
| **Chapter 11: Rural Enfield** | | | | | |
| **DM RE1: Character of the Green Belt and open countryside** | Holmes & Hills LLP, representing Mr. Newman, objects to the proposed development of Vicarage Farm in Enfield for up to 5000 homes, citing concerns over the inclusion of Mr. Newman's property within the development boundary, the reduction of green open space, and the conflict with Enfield's Local Plan and National Planning Policy Framework. The firm argues that the development would harm the Green Belt, fail to meet design and housing policies, and suggests that brownfield sites should be considered instead to preserve the Green Belt and meet housing needs sustainably. | Comments noted. Policy PL10 is sound, addressing concerns about the preservation of the Green Belt and minimizing urban sprawl. The Chase Park Topic Paper outlines measures to protect the area's special character, including Merryhills Way and the Trent Park Equestrian Centre. It provides strategies to manage increased car journeys and traffic, promote sustainable transport, and ensure the countryside feel is maintained while meeting housing needs. The policy aligns with sustainable development principles, preserving both the environment and community heritage. The council is committed to ongoing engagement with stakeholders to address concerns and refine our plans to achieve the best outcomes for the community. | No | 00012 | Holmes & Hills LLP, |

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| **DM RE1: Character of the Green Belt and open countryside** | London Wildlife Trust welcome and support the policies in this chapter RE1-4. | Support noted. | No | 01974 | London Wildlife Trust |
| **DM RE1: Character of the Green Belt and open countryside** | London Wildlife Trust welcome and support the policies in this chapter RE1-4. | Support noted. | No | 01974 | London Wildlife Trust |
| **DM RE1: Character of the Green Belt and open countryside** | The Forty Hill and Bulls Cross Study Group highlights concerns about Paragraph 2a, noting that it refers to tree planting and undefined "earth moulding" as acceptable environmental improvements in the Green Belt. They argue that both could be detrimental to the Green Belt, particularly affecting its views and openness, and are not defined in the NPPF or London Plan. | The Local Plan aims to protect and enhance the Green Belt while allowing for necessary development. It emphasizes tree planting to improve air quality, support wildlife, and enhance the landscape, aligning with the Enfield Green and Blue Infrastructure Strategy and adhering to strict planning regulations and environmental assessments to prevent negative impacts on Green Belt openness. Although "earth moulding" is not specifically defined in national policies, it involves land contour modifications designed to improve ecological habitats and visual impacts, with detailed assessments ensuring alignment with Green Belt protection principles. The Plan includes extensive public consultation and transparent evidence base documentation to support these strategies, ensuring they contribute to ecological health and sustainable green infrastructure while preserving the Green Belt's character. | No | 01879 | Forty Hill and Bulls Cross Study Group |
| **DM RE2: Improving access to the countryside and green corridors** | London Wildlife Trust welcome and support the policies in this chapter RE1-4. | Support noted. | No | 01974 | London Wildlife Trust |
| **DM RE2: Improving access to the countryside and green corridors** | The Enfield Society expresses concerns about the policy's applicability to small urban sites, the protection of tenant farmers' rights, and the definitions of 'strategic link route' and 'green grid network.' They strongly support paragraph 1e for prohibiting development at Chase Park to preserve its historic landscape. They also request that the policy number be added to the key on the policies map and that a functional link to the definitive footpaths and rights of way map be provided online. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SP RE3: Supporting the rural economy** | London Wildlife Trust welcome and support the policies in this chapter RE1-4. | Support noted. | No | 01974 | London Wildlife Trust |
| **SP RE3: Supporting the rural economy** | The Enfield Society is concerned that paragraph 8 of the policy proposes developments such as camping, caravanning, chalet, or similar facilities that may be inconsistent with national Green Belt policy. They believe these types of developments could potentially undermine the protections intended for Green Belt areas. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) | No | 01794 | Enfield Society |

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| | | are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | | | |
| **SP RE3: Supporting the rural economy** | The Enfield Society expresses that multiple proposals within the policy are inconsistent with national Green Belt policy. They emphasize that while some development may be warranted, it is crucial to ensure that any ancillary buildings and vehicular entrances do not compromise the rural and open character of areas like Whitewebbs Lane. Ensuring minimal impact on the landscape and preserving the heritage and environmental values of such areas are paramount. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **DM RE4: Farm diversification and rural employment** | London Wildlife Trust welcome and support the policies in this chapter RE1-4. | Support noted. | No | 01974 | London Wildlife Trust |
| **DM RE4: Farm diversification and rural employment** | The Enfield Society is concerned that supporting uses that contribute to regeneration and strategic policy priorities, such as landscape restoration, culture, and tourism, may lead to uses inconsistent with national Green Belt policy. They argue that the proposals for 'compensation,' including tourism and rural transformation, are not justified. These uses might invite developments that conflict with the principles of preserving the openness and purposes of the Green Belt, as outlined in their representations on Policy PL9 and SS1. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **Chapter 12: Culture, Leisure and Recreation** | | | | | |
| **SP CL1: Promoting culture and creativity** | The Theatres Trust welcomes the policy for protecting existing cultural facilities, aligning with NPPF paragraph 97. They also support the plan’s encouragement of new cultural facilities within the borough. | The Council appreciate The Theatres Trust's recognition of our alignment with NPPF paragraph 97 and our efforts to foster new cultural developments. Your feedback reinforces our commitment to maintaining and enhancing Enfield's cultural infrastructure. We look forward to continued collaboration to ensure the vibrancy of our cultural landscape. | No | 01889 | Theatres Trust |
| **SP CL1: Promoting culture and creativity** | Policy CL1 is considered unsound due to its reference to pubs, which should be removed from part 2 to avoid conflicts with Policy CL6. The policy lacks a requirement for marketing evidence and is vague, making it easy for developers to bypass protections, thus jeopardizing the few cultural facilities in the borough. This undermines the positive aspects of Policy CL6. Furthermore, there should be an explicit expectation for new pubs to be included in major redevelopment areas lacking them, such as Edmonton Green, Ponders End, and Southbury. The recent redevelopment of the Alma Road Estate, which did not include any new public house despite the loss of The Falcon and Picture Palace, exemplifies this concern. | Comments noted.<br>Enfield’s new pub protection policy (CL6) is designed to balance development needs with community interests, ensuring sustainable growth. The three-month marketing exercise, while a positive step, can be refined to specify it must occur immediately prior to applications. Involving an expert for marketing reviews can enhance objectivity, and protections for ancillary elements of pubs can be incorporated. However, the policy already aligns with broader strategies for maintaining community assets, and the emphasis on new pubs in redevelopment areas underscores the council's commitment to enhancing local amenities. | No | 02086 | Enfield and Barnet branch of CAMRA |
| **DM CL2: Leisure and tourism** | National Highways acknowledges the policies for leisure tourism and visitor accommodation, supporting the use of the NPPF sequential test for appropriateness. They recommend that Enfield Council ensures all development proposals include robust strategies, policies, and initiatives to:<br><br>Manage travel demand more effectively.<br>Mitigate the impact of additional traffic and alleviate recurring congestion. | The Council appreciates National Highways' acknowledgment of its policies for leisure tourism and visitor accommodation and their support for using the NPPF sequential test. The council agree on the importance of including robust strategies, policies, and initiatives in all development proposals to effectively manage travel demand, mitigate the impact of additional traffic, and alleviate recurring congestion. The council also recognize the need to address the challenges posed by planned or unplanned special events and tourism seasons to support the delivery of normal operations. The council is committed to working closely with | No | 01753 | National Highways Limited |

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| | Address planned or unplanned special events and tourism seasons.<br>Support the delivery of normal operations. | National Highways to ensure that these elements are comprehensively addressed in our Local Plan, promoting sustainable and efficient travel for all users. | | | |
| **DM CL2: Leisure and tourism** | The Lee Valley Regional Park Authority (LVRPA) seeks a minor amendment to Policy CL2 Leisure and Tourism. They request that the term "Lee Valley" be changed to "Lee Valley Regional Park" to enhance clarity and align with the PL9 Rural Enfield policy objectives. This amendment supports the strategic significance of the Lee Valley Leisure Complex at Pickett's Lock and ensures consistency in promoting the Regional Park as a key leisure and recreational resource without harming local biodiversity or water quality. | Comments noted. The detailed feedback is welcomed. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | No | 01918 | Lee Valley Regional Park Authority |
| **DM CL2: Leisure and tourism** | CAMRA supports Enfield's new pub protection policy but raises several concerns making Policy CL6 unsound. They suggest the three-month marketing requirement should occur immediately prior to a planning application and recommend involving an expert to review marketing exercises. They highlight the need for heightened protection in areas with a severe shortage of pubs, like Edmonton, and broader protection for pub-related elements such as gardens and car parks. CAMRA also worries about the assessment of community value being potentially biased and suggests clear criteria for such assessments. They advocate for removing references to pubs in Policy CL1 due to conflicts with CL6 and stress the importance of requiring new pubs in major redevelopment areas. Lastly, they recommend enforcement action when pubs are lost without planning consent. | Comments noted. Enfield's new pub protection policy (CL6) is designed to balance development needs with community interests, ensuring sustainable growth. The three-month marketing exercise, while a positive step, can be refined to specify it must occur immediately prior to applications. Involving an expert for marketing reviews can enhance objectivity, and protections for ancillary elements of pubs can be incorporated. However, the policy already aligns with broader strategies for maintaining community assets, and the emphasis on new pubs in redevelopment areas underscores the council's commitment to enhancing local amenities. | No | 02054 | Campaign to Protect Real Ale |
| **DM CL3: Visitor accommodation** | National Highways acknowledges the policies for leisure tourism and visitor accommodation, supporting the use of the NPPF sequential test for appropriateness. They recommend that Enfield Council ensures all development proposals include robust strategies, policies, and initiatives to:<br><br>Manage travel demand more effectively.<br>Mitigate the impact of additional traffic and alleviate recurring congestion.<br>Address planned or unplanned special events and tourism seasons.<br>Support the delivery of normal operations. | The Council appreciates National Highways' acknowledgment of its policies for leisure tourism and visitor accommodation and their support for using the NPPF sequential test. The council agree on the importance of including robust strategies, policies, and initiatives in all development proposals to effectively manage travel demand, mitigate the impact of additional traffic, and alleviate recurring congestion. The council also recognize the need to address the challenges posed by planned or unplanned special events and tourism seasons to support the delivery of normal operations. The council is committed to working closely with National Highways to ensure that these elements are comprehensively addressed in our Local Plan, promoting sustainable and efficient travel for all users. | No | 01753 | National Highways Limited |
| **DM CL3: Visitor accommodation** | The Lee Valley Regional Park Authority (LVRPA) seeks an amendment to Policy CL3 Visitor Accommodation, specifically under paragraph 4. They previously suggested that the Regional Park be recognized as a location for potential visitor accommodation facilities, including camping grounds, hotels, and lodges. Although the Council's Statement on Regulation 18 Consultation acknowledged this suggestion, it was not included in the current draft of the Local Plan. The LVRPA requests a modification to Policy CL3 to explicitly reference the Regional Park as a suitable location for such accommodations. | Comments noted. The detailed feedback is welcomed. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | No | 01918 | Lee Valley Regional Park Authority |
| **SP CL4: Promoting sporting excellence** | Sport England considers the current policies on sport and recreation facilities unsound due to the lack of a robust and up-to-date evidence base. An updated evidence base and strategy documents are essential to ensure the policies are justified and effective. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP CL4: Promoting sporting excellence** | Sport England welcomes the strategy in policy CL4: Promoting Sporting Excellence but notes some elements do not comply with national policy or Sport England's Playing Field Policy. Concerns include: The council's Playing Pitch Strategy (PPS) from 2018 is outdated. Sport England encourages updating it or adding wording to paragraph 1 to ensure development and investment contribute to actions in the PPS and any other sports facility strategy. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP CL4: Promoting sporting excellence** | Sport England notes that Paragraph 1.b of CL4 states that publicly accessible strategic sport and leisure facilities will be provided based on a location hierarchy, but this hierarchy lacks up-to-date evidence. This could lead to facilities being placed in non-strategically identified locations. The 2018 PPS does not mention Tottenham Hotspur's Training Facility, and the Enfield Health and Wellbeing | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |

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| | Strategy does not reference the priority facilities listed. While Picketts Lock, Enfield Playing Fields, and Firs Farm are mentioned in the Blue and Green Infrastructure Strategy, there is insufficient information on what sport and recreation facilities will be delivered and the supporting evidence base for these decisions. | | | | |
| **SP CL4: Promoting sporting excellence** | Tottenham Hotspur FC supports Policy CL4's aim to promote sporting excellence but seeks several modifications for clarity and effectiveness. They suggest removing development management criteria from Policy CL4 and including them in Allocation RUR.07 instead. They also recommend specifying that public access should only be required where compatible with professional sports environments and that the term "maximise" in reference to public access should be replaced with "enhance." Additionally, they request the inclusion of precise language to ensure policy clarity and alignment with strategic goals. These changes are deemed necessary to ensure the Local Plan's soundness. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP CL4: Promoting sporting excellence** | Tottenham Hotspur FC supports Policy CL4's aim to promote sporting excellence but seeks several modifications for clarity and effectiveness. They suggest removing development management criteria from Policy CL4 and including them in Allocation RUR.07 instead. They also recommend specifying that public access should only be required where compatible with professional sports environments and that the term "maximise" in reference to public access should be replaced with "enhance." Additionally, they request the inclusion of precise language to ensure policy clarity and alignment with strategic goals. These changes are deemed necessary to ensure the Local Plan's soundness. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
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| **SP CL4: Promoting sporting excellence** | Form received asking the council to refer to the separate representation documents. | Received with thanks. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP CL4: Promoting sporting excellence** | Tottenham Hotspur FC supports Policy CL4's aim to promote sporting excellence but seeks several modifications for clarity and effectiveness. They suggest removing development management criteria from Policy CL4 and including them in Allocation RUR.07 instead. They also recommend specifying that public access should only be required where compatible with professional sports environments and that the term "maximise" in reference to public access should be replaced with "enhance." Additionally, they request the inclusion of precise language to ensure policy clarity and alignment with strategic goals. These changes are deemed necessary to ensure the Local Plan's soundness. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
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| **SP CL4: Promoting sporting excellence** | Tottenham Hotspur FC supports Policy CL4's aim to promote sporting excellence but seeks several modifications for clarity and effectiveness. They suggest removing development management criteria from Policy CL4 and including them in Allocation RUR.07 instead. They also recommend specifying that public access should only be required where compatible with professional sports environments and that the term "maximise" in reference to public access should be replaced with "enhance." Additionally, they request the inclusion of precise language to ensure policy clarity and alignment with strategic goals. These changes are deemed necessary to ensure the Local Plan's soundness. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **SP CL4: Promoting sporting excellence** | Tottenham Hotspur FC supports Policy CL4's aim to promote sporting excellence but seeks several modifications for clarity and effectiveness. They suggest removing development management criteria from Policy CL4 and including them in Allocation RUR.07 instead. They also recommend specifying that public access should only be required where compatible with professional sports environments and that the term "maximise" in reference to public access should be replaced with "enhance." Additionally, they request the inclusion of precise language to ensure policy clarity and alignment with strategic goals. These changes are deemed necessary to ensure the Local Plan's soundness. | Comments noted. The Council supports the promotion of sporting excellence but believes that the suggested modifications would undermine key objectives of the Enfield Local Plan. Removing development management criteria from Policy CL4 and placing them solely in Allocation RUR.07 risks disconnecting important planning requirements from the overarching policy framework. Retaining these criteria in Policy CL4 ensures consistency across the borough and aligns with both Enfield's Blue and Green Strategy and viability considerations, which stress the need for integrated and strategic planning. Regarding public access, the Council acknowledges the importance of balancing professional sports environments with community needs. However, the term "maximise" is appropriate to ensure that developments contribute to broader community and accessibility goals. Changing this to "enhance" may limit the scope of public benefit. Ensuring public access, where it does not interfere with professional sports activities, is a key aspect of promoting inclusivity and ensuring that sporting facilities benefit the wider community, as set out in Enfield's planning evidence base. The request for more precise language is noted, but the Council believes that the current wording allows for sufficient flexibility to address site-specific conditions while still maintaining alignment with strategic goals for sports development and community access. In summary, the Council remains committed to the objectives of Policy CL4 as it is currently drafted, ensuring both professional sporting success and community benefit without diluting key planning principles. | No | 02089 | Tottenham Hotspur Football Co Ltd |
| **SP CL4: Promoting sporting excellence** | Friends of Whitewebbs Park argue that prioritizing sporting excellence in policy is legally flawed, unsound, and confusing. They assert that local authorities should focus on providing accessible amenities for all ages to improve public health rather than supporting elite sports, which have ample funding. The park's natural state benefits community health, and intensive sports facilities should be near population centers, not on valuable green belt land. They highlight a High Court judgment indicating limited public access to elite sports facilities, questioning the justification for such developments in Whitewebbs Park for commercial gain by wealthy entities. | Comments noted. Such developments can provide significant community benefits by inspiring local talent, creating jobs, and stimulating economic growth. When carefully integrated, these facilities can enhance rather than diminish local amenities by incorporating public-access features and contributing additional resources for park maintenance. Such sports venues, when planned with community needs in mind, can coexist with and even improve public access to green spaces, aligning with broader goals of public health and well-being. | No | 01805 | Friends of Whitewebbs Park |
| **DM CL5: Sport, open space and recreation** | Sport England supports policy CL5: Sport, Open Space and Recreation but notes it focuses more on open space, while sport is also played indoors. This is acknowledged in Paragraph 12.25 of the supporting text, but Sport England recommends highlighting this more within the policy itself. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **DM CL5: Sport, open space and recreation** | At Para 2b of CL5 Sport England recommends that the inclusion of 'in terms of quantity and quality' is included in this paragraph to ensure that replacement facilities meet the needs of the community. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **DM CL5: Sport, open space and recreation** | At Para 12 of CL5 Sport England would recommend that an additional criterion is added that requires new artificial grass pitches to meet a demonstratable local community need. This would ensure that there is not an over-proliferation of such facilities and that the facility can generate enough income to be sustainable in the long-term. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |

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| **DM CL5: Sport, open space and recreation** | At Table 12.1 of CL5 Sport England DO NOT support the space standard approach in relation to playing pitches as this does not fully reflect the nuance of sport needs. As a result, as suggested in paragraph 12.28, developments should be assessed on a case by case basis and any sport facility requirements should be based on needs/issues identified in sport facility strategies and pre-application discussions. Therefore, Sport England recommends that Table 12.1 is amended to omit the requirements for playing pitches in the table and notes that sports provision would be considered on a case by case basis. Sport England would like to see the removal of the sentence from 12.29 which states '…expected to meet the standards relating to quality, quantity and accessibility set out in Table 12.1' as Sport England do not support the standards approach in relation to playing pitches. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **DM CL5: Sport, open space and recreation** | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) supports the intentions of Policy CL5: Sport, Open Space, and Recreation in the Enfield Local Plan (Reg 19) but identifies several issues that render it non-compliant with relevant legislation and not sound. While acknowledging the health, social, and environmental benefits of open space, ELUWG highlights the lack of up-to-date evidence, particularly regarding the Playing Pitch Strategy, which limits the policy's effectiveness in addressing local deficiencies in sports facilities. They argue that the plan fails to provide adequate new open spaces in areas with existing deficits, such as Edmonton, where significant population growth is anticipated. ELUWG criticizes the plan's reliance on outdated assessments and the unclear responsibility for managing new green spaces, which raises concerns about the viability and delivery of CL5's objectives. Furthermore, they point out inconsistencies between the policy and the overarching goals of the London Plan 2021 and the National Planning Policy Framework (NPPF 2023), particularly in terms of promoting healthy, safe communities and addressing open space needs. ELUWG suggests that the monitoring metrics should be improved to better track gains and losses in open space, allotments, play spaces, and playing pitches to ensure the policy effectively addresses identified needs and deficiencies. | Comment noted. This change is not considered to be necessary to make the policy sound. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **DM CL6: Protecting and attracting public houses** | CAMRA supports Enfield's new pub protection policy but raises several concerns making Policy CL6 unsound. They suggest the three-month marketing requirement should occur immediately prior to a planning application and recommend involving an expert to review marketing exercises. They highlight the need for heightened protection in areas with a severe shortage of pubs, like Edmonton, and broader protection for pub-related elements such as gardens and car parks. CAMRA also worries about the assessment of community value being potentially biased and suggests clear criteria for such assessments. They advocate for removing references to pubs in Policy CL1 due to conflicts with CL6 and stress the importance of requiring new pubs in major redevelopment areas. Lastly, they recommend enforcement action when pubs are lost without planning consent. | Comments noted. Enfield's new pub protection policy (CL6) is designed to balance development needs with community interests, ensuring sustainable growth. The three-month marketing exercise, while a positive step, can be refined to specify it must occur immediately prior to applications. Involving an expert for marketing reviews can enhance objectivity, and protections for ancillary elements of pubs can be incorporated. However, the policy already aligns with broader strategies for maintaining community assets, and the emphasis on new pubs in redevelopment areas underscores the council's commitment to enhancing local amenities. | No | 02054 | Campaign to Protect Real Ale |
| **DM CL6: Protecting and attracting public houses** | CAMRA supports a new pub protection policy but finds Policy CL6 unsound due to several concerns. The three-year marketing requirement should specify that it applies to the period immediately before a planning application to avoid gaps. Additionally, the Council should hire an expert to review marketing exercises for change of use applications. The policy should document the number of lost public houses, especially in areas like Edmonton with significant deficits, and should apply to all pubs without needing to prove specific community interest. Broader protections should extend to ancillary elements of pubs, requiring evidence that their removal won't affect viability. The wording in paragraph 12.44 about assessing community value is problematic, as it may bias assessments and overlook community needs. Reference to pubs in Policy CL1 should be removed to avoid conflicts with CL6, which also lacks specific marketing evidence requirements, making it easier for developers to bypass protections. Finally, the policy should expect new pubs in major redevelopment areas lacking them, as demonstrated by the recent Alma Road Estate project, which failed to include any new public houses. | Comments noted.<br>Enfield's new pub protection policy (CL6) is designed to balance development needs with community interests, ensuring sustainable growth. The three-month marketing exercise, while a positive step, can be refined to specify it must occur immediately prior to applications. Involving an expert for marketing reviews can enhance objectivity, and protections for ancillary elements of pubs can be incorporated. However, the policy already aligns with broader strategies for maintaining community assets, and the emphasis on new pubs in redevelopment areas underscores the council's commitment to enhancing local amenities. | No | 02086 | Enfield and Barnet branch of CAMRA |

| Chapter 13: Movement and Connectivity | | | | | |
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| **SP T1: A sustainable and decarbonised transport system** | The GLA welcomes the draft local plan's aspiration to support sustainable growth by promoting walking, cycling, and public transport. | Support noted. | No | 00120 | Greater London Authority (GLA) |
| **SP T1: A sustainable and decarbonised transport system** | The London Borough of Redbridge supports the proposed measures and policy expectations for strategic transport improvements, public transport, and active travel. They also endorse the safeguarding approach for Crossrail 2, contingent on future funding availability. | Support noted. The London Borough of Enfield appreciates the London Borough of Redbridge's endorsement of our proposed measures and policy expectations for strategic transport improvements, public transport, and active travel. Enfield also value their support for our safeguarding approach for Crossrail 2, which is contingent on future funding availability. These measures align with Enfield's commitment to enhancing sustainable transport infrastructure and connectivity across the borough. | No | 01603 | London Borough of Redbridge |
| **SP T1: A sustainable and decarbonised transport system** | National Highways supports the requirement for Transport Assessments (TAs) in policies T1 and T3 to ensure sustainable infrastructure but highlights several concerns. They note that the NPPF (2023) does not mandate TAs or travel plans (TPs), and these assessments may not be sufficient to achieve net zero emissions and 20-minute neighborhoods, particularly for large developments. TAs might obscure traffic impacts with optimistic work-from-home assumptions, and TPs, often voluntary and non-binding, may be neglected by developers. They recommend considering the "Vision Led" TA process from DfT Circular 01/2022. Additional issues include the lack of tailored TP guidance for new developments, varying quality of TPs, difficulty in setting targets for unknown end-users, and limited resources for local governments to monitor and enforce TPs. National Highways stresses the need for new processes to move away from a 'predict and provide' approach. | The Council acknowledges and appreciates National Highways' detailed feedback on Policies T1 and T3 regarding Transport Assessments (TAs) and Travel Plans (TPs). We recognize the challenges highlighted, including the limitations in achieving net zero emissions and 20-minute neighborhoods, the voluntary nature of TPs, and enforcement issues. To address these, we will work to enhance the expertise of planning officers, improve monitoring mechanisms, and ensure consistent quality in TPs. Enfield Council is eager to collaborate with National Highways and other stakeholders to refine our approach, align with sustainable development principles, and effectively support our goals for reduced emissions, sustainable infrastructure, and vibrant 20-minute neighborhoods. The council is willing to work together and seek further engagement and a statement of common ground to ensure all transport-related aspects of the Local Plan are robust and deliverable. | No | 01753 | National Highways Limited |
| **SP T1: A sustainable and decarbonised transport system** | HCC's response emphasizes that Enfield's Local Plan should align with Hertfordshire's Local Transport Plan (LTP4), focusing on sustainable transport and reducing car dependency. They highlight the importance of infrastructure for walking, cycling, and public transport, and managing travel demand. HCC supports Enfield's sustainable travel policies but notes specific concerns about some spatial allocations. They stress the need for cross-boundary impacts to be addressed, ensuring strategic sites are accessible by sustainable travel to mitigate congestion in areas bordering Enfield. | Comments noted. The Council acknowledge HCC's key principles of supporting sustainable transport, prioritizing walking, cycling, and public transport, and managing travel demand. Enfield Council is committed to addressing potential cross-boundary impacts and enhancing sustainable travel connections. The Council will ensure these concerns are addressed through a Statement of Common Ground (SoCG) with Hertfordshire County Council. | No | 01755 | Hertfordshire County Council - Highways |
| **SP T1: A sustainable and decarbonised transport system** | The NHS London Healthy Urban Development Unit (HUDU) strongly supports Enfield's commitment to achieving an 80% mode share for active and sustainable travel by 2041. They suggest emphasising the significant benefits of walking and cycling within the policy. | The Local Plan seeks to ensure that walking and cycling are prioritised as modes of transport and reduce the need to travel. Planning policy can only apply where developments need planning permission and the policy is reasonably related to the development that is being proposed. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP T1: A sustainable and decarbonised transport system** | TfL notes the approach to car parking is now addressed in policies T2 and T3. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP T1: A sustainable and decarbonised** | Mitigation Requirements: TfL appreciates the expanded requirements for mitigation in parts 10a and 10b, but recommends clarifying that part 10b also applies to additional rail station capacity. They also suggest adding bus priority measures, | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of | No | 01891 | Transport for London |

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| **transport system** | bus stands, and bus drivers' facilities to the list of bus network infrastructure in part 9a. | Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SP T1: A sustainable and decarbonised transport system** | While noting the aspiration to improve frequency on Enfield Town/Cheshunt services, TfL states they cannot commit to such improvements due to current funding constraints. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP T1: A sustainable and decarbonised transport system** | TfL's previous comments on the Crossrail 2 project remain unchanged, with no updates in status or safeguarding. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP T1: A sustainable and decarbonised transport system** | TfL supports the positive approach to cycling in part 8, including London Plan targets, but suggests specifying that cycle route designs should follow London Cycling Design Standards (LCDS). Part 8c should confirm that London Plan cycle parking standards will be met, accommodating adapted cycles and cargo bikes, and that hire bike/scooter provisions should be additional to cycle parking requirements. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP T1: A sustainable and decarbonised transport system** | Network Rail (NR) emphasises the importance of managing safety risks associated with developments near rail infrastructure and urges early engagement from developers for necessary agreements, especially for new rail crossings, which should be bridges. Enhancements to footways on road bridges and upgrades to railway boundary fences may be required, funded by developers. NR highlights the importance of connectivity improvements at New Southgate, Crews Hill, and Chase Park. | Comments noted. The Council appreciates Network Rail's emphasis on managing safety risks associated with developments near rail infrastructure and the call for early engagement from developers. The necessity for bridges for new rail crossings, improvements to footways on road bridges, and upgrades to railway boundary fences funded by developers is noted. The Council is committed to enhancing connectivity at New Southgate, Crews Hill, and Chase Park. Further engagement and a statement of common ground will be pursued to address and resolve these issues collaboratively. | No | 01993 | Network Rail |
| **SP T1: A sustainable and decarbonised transport system** | Network Rail (NR) currently has no capacity concerns regarding proposed housing numbers but requires ongoing consultation. NR welcomes private investment for capacity and accessibility improvements at stations and in the network. They highlight the importance of integrated travel improvements and the potential for Crossrail 2 on the West Anglia Main Line, while discouraging permanent redevelopment within the safeguarded Crossrail 2 corridor. | Comments noted. The Council appreciates Network Rail's confirmation of no current capacity concerns regarding proposed housing numbers and the importance of ongoing consultation. The Council welcomes Network Rail's support for private investment for capacity and accessibility improvements at stations and within the network. The emphasis on integrated travel improvements and the potential for Crossrail 2 on the West Anglia Main Line is acknowledged. The Council agrees on discouraging permanent redevelopment within the safeguarded Crossrail 2 corridor. Further engagement and a statement of common ground will be pursued to address these matters collaboratively. | No | 01993 | Network Rail |
| **SP T1: A sustainable and decarbonised transport system** | Network Rail (NR) requires future consultation as specific development plans progress to understand impacts. Informative guidelines for works near NR infrastructure are provided. NR is keen to remain engaged in the preparation and ongoing consultations for the Enfield Local Plan. | Comments noted. The Council acknowledges Network Rail's requirement for future consultation as specific development plans progress to understand impacts. The Council appreciates the informative guidelines provided for works near NR infrastructure and values NR's keen interest in remaining engaged in the preparation and ongoing consultations for the Enfield Local Plan and look forward to further collaboration and a statement of common ground to ensure comprehensive planning and safety around NR infrastructure. | No | 01993 | Network Rail |
| **SP T1: A sustainable and decarbonised transport system** | Network Rail (NR) requires future consultation as specific development plans progress to understand impacts. Informative guidelines for works near NR infrastructure are provided. NR is keen to remain engaged in the preparation and ongoing consultations for the Enfield Local Plan. | Comments noted. The Council acknowledges Network Rail's requirement for future consultation as specific development plans progress to understand impacts. The Council appreciates the informative guidelines provided for works near NR infrastructure and values NR's keen interest in remaining engaged in the preparation and ongoing consultations for the Enfield Local Plan and look forward to further collaboration and a statement of common ground to ensure comprehensive planning and safety around NR infrastructure. | No | 01993 | Network Rail |

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| **SP T1: A sustainable and decarbonised transport system** | Appendix A contains specific Asset Protection (ASPRO) informatives for developers. | Comments noted and the council looks forward to further collaboration and a statement of common ground to ensure comprehensive planning and safety around NR infrastructure. | No | 01993 | Network Rail |
| **SP T1: A sustainable and decarbonised transport system** | Network Rail (NR) welcomes the opportunity to discuss further policy, site policy protection, and infrastructure intensification in Enfield, considering impacts on local, regional, or national levels. NR is particularly interested in collaborating with the Council on urban regeneration aspirations, as referenced in the Council's policy document on Pg. 324 and elsewhere. | Comments noted. The Council is pleased to engage further with Network Rail on policy, site protection, and infrastructure intensification in Enfield. The Council appreciates NR's interest in collaborating on urban regeneration aspirations as referenced in its policy document. The Council looks forward to ongoing discussions to ensure that local, regional, and national impacts are considered, and a statement of common ground can be developed to support these initiatives effectively. | No | 01993 | Network Rail |
| **SP T1: A sustainable and decarbonised transport system** | Network Rail (NR) emphasises the importance of infrastructure plans and site intensification impacting the operational railway. Sites should not be considered free of impact or favorably allocated for residential or mixed-use unless they are supported by, beneficial to, or confirmed to have no notable detrimental impact on the railway. | Comments noted. The Council acknowledges the importance of ensuring that infrastructure plans and site intensification do not negatively impact the operational railway. The Council will carefully consider the effects on railway operations when allocating sites for residential or mixed-use development. The Council look forward to ongoing collaboration with Network Rail to ensure that developments are either beneficial to the railway or have no significant detrimental impact. Further engagement and the development of a statement of common ground will help address these concerns effectively. | No | 01993 | Network Rail |
| **SP T1: A sustainable and decarbonised transport system** | LB Barnet's Head of Transport Strategy reviewed LB Enfield's Reg 19 draft Local Plan, highlighting several key points. The plan should consider the impact of development proposals near the borough boundary on neighboring transport networks. Policy T1 promotes sustainable transport networks and recommends collaboration between Enfield and neighboring boroughs on boundary-related transport projects. This is particularly relevant if the London Mayor's "Super Loop 2" proposal, including a service from High Barnet to Walthamstow via Enfield and Chingford, proceeds. The plan should explicitly recognize the transport implications for areas near the boundary, such as Southgate and New Southgate. Barnet's recent Strategic Transport Assessment indicates several junctions in High Barnet and Whetstone are near capacity, with others potentially nearing capacity depending on local plan demand management. Currently, the additional traffic flows modeled do not cause undue concern. | The Council appreciate LB Barnet's thorough review of our Reg 19 draft Local Plan and their insights on transport implications. Enfield acknowledges the importance of considering boundary effects on neighboring transport networks and commits to ongoing collaboration on relevant projects, including the potential "Super Loop 2" proposal. The Council will continue to engage with Barnet to monitor and address junction capacities and traffic flows, ensuring coordinated and sustainable transport solutions. | No | 02091 | London borough of Barnet |
| **SP T1: A sustainable and decarbonised transport system** | LB Barnet's draft Local Plan notes that one of the proposed Crossrail 2 routes could connect to New Southgate, with potential delivery towards the latter part of Barnet's plan period (2021-2036). The Statement of Common Ground between the boroughs affirms their joint support for promoting the potential Crossrail 2 route at New Southgate. This is reflected in Enfield's draft policy T1, which safeguards land for future infrastructure projects like Crossrail 2, and Policy PL7, which envisions New Southgate as a key gateway with enhanced connections to Enfield and neighboring boroughs. LB Barnet welcomes this approach. | The Council is pleased to see that LB Barnet supports the approach outlined in Policy PL7, which envisions New Southgate as a key gateway with enhanced connections to Enfield and neighboring boroughs. We are committed to continuing our collaboration with LB Barnet to support and promote the potential Crossrail 2 route, as reflected in both the Statement of Common Ground and draft policy T1. | Yes | 02091 | London borough of Barnet |
| **SP T1: A sustainable and decarbonised transport system** | The Canal and Rivers Trust provided feedback on Policy T1 regarding a sustainable and decarbonized transport system, emphasizing that any bridge crossings require the Trust's agreement, adherence to their 'Code of Practice,' and detailed design plans. They also clarified that the Trust will not assume future ownership or maintenance of bridges. The Trust highlighted the need for development to respect the waterways' varying character areas, noting the importance of grassed verges for mooring, safety, and biodiversity. They mentioned their updated towpath design guide and the need to consider exemptions in LTN1/20. The Trust expressed concerns about towpath lighting due to lack of power and maintenance capabilities, suggesting low-level lighting or reflectors instead. They recommended expanding the policy's supporting text to include these considerations and acknowledge relevant guidance. | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |

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| **DM T2: A healthy and connected Enfield** | National Highways' response to policies T1 and T3 regarding the requirement for a Transport Assessment (TA) supports the need for TAs to ensure sustainable infrastructure but raises several concerns. They note that the NPPF (2023) does not mandate TAs or travel plans (TPs) and question their sufficiency in achieving net zero emissions and 20-minute neighborhoods, particularly for large developments. Concerns include the potential for TAs to obscure traffic impacts through optimistic work-from-home assumptions, the non-binding nature of TPs, and the lack of expertise among planning officers in assessing and mitigating transport impacts. They suggest considering the "Vision Led" TA process as referenced by DfT Circular 01/2022. Issues with TPs include their tailored nature to existing workplaces, the varying quality submitted with applications, difficulties in setting targets for unknown end-users, and local governments' lack of resources for effective monitoring and enforcement. National Highways emphasizes the need for new processes and assessments to move away from the 'predict and provide' approach. | The Council acknowledges and appreciates National Highways' detailed feedback on Policies T1 and T3 regarding Transport Assessments (TAs) and Travel Plans (TPs). We recognize the challenges highlighted, including the limitations in achieving net zero emissions and 20-minute neighborhoods, the voluntary nature of TPs, and enforcement issues. To address these, we will work to enhance the expertise of planning officers, improve monitoring mechanisms, and ensure consistent quality in TPs. Enfield Council is eager to collaborate with National Highways and other stakeholders to refine our approach, align with sustainable development principles, and effectively support our goals for reduced emissions, sustainable infrastructure, and vibrant 20-minute neighborhoods. The council is willing to work together and seek further engagement and a statement of common ground to ensure all transport-related aspects of the Local Plan are robust and deliverable. | No | 01753 | National Highways Limited |
| **DM T2: A healthy and connected Enfield** | National Highways supports commercial and business development and expansion within existing areas or re-occupation of vacant floorspace to reduce traffic on the M25 from short and local trips. They advocate for retail activities in sustainable locations serviced by sustainable transport. They emphasize considering cumulative impacts of changes, as all town centre activities generate trips with origins and destinations. According to para 51 in the circular, if a transport assessment indicates severe residual cumulative impacts on the SRN or unacceptable safety impacts, developers must identify necessary transport improvements. They also note that primary shopping areas, often hosting high-trip attractions like medical centres and childcare venues, generate significant traffic, particularly during peak hours, and people are generally unwilling to walk or cycle to these destinations. | The Council welcomes National Highways' support for commercial and business development within existing areas and the re-occupation of vacant floorspace to reduce traffic on the M25. The council acknowledge the importance of situating retail activities in sustainable locations serviced by sustainable transport. The council will carefully consider the cumulative impacts of these changes, recognizing that all town centre activities generate trips with various origins and destinations. In alignment with paragraph 51 of the DfT Circular 02/2013, the council is committed to ensuring that transport assessments for developments identify necessary improvements if severe residual cumulative impacts on the SRN or unacceptable safety impacts are indicated. The council also recognize that primary shopping areas, often home to high-trip attractions such as medical centres and childcare venues, generate significant traffic, particularly during peak hours. The council will work collaboratively with National Highways to address these challenges and develop effective transport solutions that promote sustainable and safe travel options. | No | 01753 | National Highways Limited |
| **DM T2: A healthy and connected Enfield** | HCC notes the policy statement:<br><br>“utilising the London Plan parking standards as the maximum permitted but may consider further reductions in car parking provision based on local considerations. This could include limiting on-site parking spaces designated for disabled people where necessary, and/or essential operational or servicing needs only.” HCC seeks clarification on whether it should read: “This could include limiting on-site parking to spaces designated for disabled people…” | Comments noted. The Council is keen to engage further on this matter and will prepare a Statement of Common Ground (SoCG) with HCC to collaboratively address these transportation concerns and ensure the proposed developments align with both Enfield’s and Hertfordshire’s strategic transport and infrastructure goals. | Yes | 01755 | Hertfordshire County Council - Strategic Transport & Rail |
| **DM T2: A healthy and connected Enfield** | The NHS London Healthy Urban Development Unit (HUDU) welcomes the policy's recognition that active travel and mobility are essential components of a healthy lifestyle. They also support adherence to the 'Healthy Streets indicators' as appropriate. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **DM T2: A healthy and connected Enfield** | TfL welcomes the reference to the goal of achieving zero road deaths by the specified year. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| **DM T2: A healthy and connected Enfield** | TfL notes the approach to car parking is now addressed in policies T2 and T3. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM T2: A healthy and connected Enfield** | TfL notes that Policy T2 has been renamed "Forming a healthy and connected Enfield" and a new Policy T3 "A vibrant and safe Enfield for everyone" has been added. They appreciate the references to the Healthy Streets Approach in parts 1 and 2. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM T2: A healthy and connected Enfield** | TfL strongly supports parts 2a and 2b, which aim to encourage a substantial shift from private car journeys to active transport modes and to create quieter neighborhoods by removing road traffic and prioritizing active travel measures. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM T2: A healthy and connected Enfield** | TfL welcomes the statement in part 3 that the Council will limit parking availability by adhering to the London Plan parking standards as the maximum permitted. They suggest a minor modification to the final sentence of part 3a for clarity: "This could include limiting on-site parking to spaces designated for disabled people where necessary, and/or essential operational or servicing needs only." | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM T2: A healthy and connected Enfield** | TfL also supports part 3b, which prohibits issuing parking permits for new developments, and part 3c, which considers redeveloping existing car parks for alternative uses. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM T2: A healthy and connected Enfield** | TfL welcomes the statement in part 1 that developments well connected by public transport and with active travel opportunities should be designed as car-free or with very low parking provision, in line with London Plan standards. They also support the emphasis on well-connected, high-quality, convenient, and safe active travel routes. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM T2: A healthy and connected Enfield** | London borough of Waltham Forest broadly supports Enfield's policy agenda of encouraging investment in active and sustainable transport infrastructure. However, they suggest that Enfield go further in Policy T2 Part 3 to reduce car parking, ensuring it supports the active and sustainable travel program and meets MTS targets on vehicle trip reduction and road safety through Vision Zero. Enfield should consider setting its own car parking standards that exceed the London Plan, as the flexibility in the London Plan can allow significant car parking in low PTAL, outer London areas, potentially increasing vehicle traffic. Additionally, they encourage Enfield to make a stronger commitment to redeveloping existing car parks for alternative uses. | The Council appreciates the support from the London Borough of Waltham Forest for Enfield's policy agenda on active and sustainable transport infrastructure. The Council acknowledge the suggestion to strengthen Policy T2 Part 3 by reducing car parking further to support active and sustainable travel, meeting MTS targets on vehicle trip reduction and Vision Zero for road safety. The Council will consider setting more stringent car parking standards that exceed the London Plan, especially for low PTAL, outer London areas. Additionally, the council will explore stronger commitments to redevelop existing car parks for alternative uses, promoting sustainable urban development. The Council look forward to continued collaboration to achieve these goals. | No | 02006 | London borough of Waltham Forest |
| **DM T2: A healthy and connected Enfield** | SEGRO acknowledges the general approach toward a healthy and connected Enfield but requests greater flexibility in the policy wording to reflect the specific requirements of employment sites and their occupiers. They emphasize the need for adequate car parking that meets employment occupiers' needs while providing for other transportation modes. SEGRO stresses that the policy should consider site-specific characteristics and operational needs to ensure the delivered floorspace remains attractive and lettable to the market. | The council appreciates SEGRO's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with SEGRO and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01922 | SEGRO |
| **DM T3: Constructing a vibrant and safe Enfield for everyone** | National Highways' response regarding policies T1 and T3 and the requirement for a Transport Assessment (TA) includes support for the TA to ensure sustainable infrastructure. However, they highlight several key issues:<br><br>1) The NPPF (2023) does not mandate a TA or travel plan (TP). | The Council acknowledges and appreciates National Highways' detailed feedback on Policies T1 and T3 regarding Transport Assessments (TAs) and Travel Plans (TPs). We recognize the challenges highlighted, including the limitations in achieving net zero emissions and 20-minute neighborhoods, the voluntary nature of TPs, and enforcement issues. To address these, we will work to enhance the | No | 01753 | National Highways Limited |

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| | 2) TAs and TPs may not be sufficient to achieve net zero, reduced emissions, and 20-minute neighborhoods, especially for large developments.<br>3) TAs can obscure significant traffic impacts by making optimistic assumptions about work-from-home percentages.<br>4) TPs are often voluntary and not legally binding, leading to potential neglect by developers.<br>5) The "Vision Led" TA process, as referenced by DfT Circular 01/2022, should be considered, as adopted by Oxfordshire and Somerset Councils.<br>6) TAs and TPs may be approved by planning officers without sufficient expertise in transport assessment and mitigation measures.<br>7) TP guidance is often tailored to existing workplaces, not new developments.<br>8) The varying quality of TPs submitted with planning applications can set poor precedents.<br>9) The unknown end-users make it difficult to set appropriate targets and monitoring measures for TPs.<br>10) Local governments often lack the resources to effectively monitor and enforce TPs.<br>11) Monitoring requirements can be complex, and local authorities may lack the necessary skills and resources.<br>12) National Highways stresses that moving away from a 'predict and provide' approach will require new and adapted processes and assessments to address these issues. | expertise of planning officers, improve monitoring mechanisms, and ensure consistent quality in TPs. Enfield Council is eager to collaborate with National Highways and other stakeholders to refine our approach, align with sustainable development principles, and effectively support our goals for reduced emissions, sustainable infrastructure, and vibrant 20-minute neighborhoods. The council is willing to work together and seek further engagement and a statement of common ground to ensure all transport-related aspects of the Local Plan are robust and deliverable. | | | |
| **DM T3: Constructing a vibrant and safe Enfield for everyone** | TfL welcomes the references to Construction Logistics Plans and Delivery and Servicing Plans in parts 3 and 6c, but suggests using the London Plan terminology consistently. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM T3: Constructing a vibrant and safe Enfield for everyone** | TfL appreciates the requirement in part 2 for Transport Assessments to include an Active Travel Zone Assessment and provide mitigation where appropriate. They suggest clarifying that this assessment should consider conditions during both day and night. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM T3: Constructing a vibrant and safe Enfield for everyone** | TfL recommends widening the issues of safety to include personal security and ensuring safe travel during evenings and night-time. They suggest referencing the Mayor's strategy to eliminate Violence Against Women and Girls (VAWG) and design guidance such as GLA's "Safety in Public Spaces: Women, Girls and Diverse People." | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **DM T3: Constructing a vibrant and safe Enfield for everyone** | TfL reiterates that contributions towards public transport improvements should have equal priority with affordable housing to align with the London Plan. Such contributions are necessary for development in the Placemaking areas, as specified in the individual policies. This priority should be reflected in the Infrastructure Delivery Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **Chapter 14: Environmental Protection** | | | | | |
| **DM ENV1: Local environmental protection** | The Metropolitan Police Service Design Out Crime Team highlights the importance of lighting in enhancing community safety and supporting nighttime activities. However, policy ENV1 seeks to prevent light pollution, including glare and light spillage, to avoid negatively impacting residential amenities or the countryside's character. The goal is to balance the benefits of lighting for safety and evening activities with the need to protect the environment and quality of life. | Comments noted. The council is supportive of a design-led approach to achieve optimum site density while prioritizing safety and security through the implementation of Secured by Design principles. This policy ensures the integration of proven crime prevention measures from the design and planning stages, significantly enhancing the safety and security of residents and the broader community. Each application will be evaluated individually, ensuring tailored solutions that promote safety, resilience, and community well-being. | No | 01721 | Metropolitan Police Service Design out Crime Team |
| **DM ENV1: Local environmental protection** | Natural England welcomes Policy ENV1's commitment to ensuring all major developments are at least air quality neutral, which will help reduce air quality impacts on designated European sites. However, they emphasize the need for | Comments noted. The council acknowledges Natural England's emphasis on the need for measures to ensure smaller developments do not harm designated European sites, in addition to the commitment to air quality neutrality for major | No | 01743 | Natural England |

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| | further measures to ensure smaller developments do not harm these designated sites. | developments. The council will be preparing a Statement of Common Ground with Natural England to address these concerns comprehensively. | | | |
| **DM ENV1: Local environmental protection** | The Environment Agency supports Policy ENV1 – Environmental Protection, particularly the stipulation in Paragraph A that new developments with adverse impacts on water quality, including Source Protection Zones and Aquifers, will not be permitted. The EA recommends adding a hyperlink or footnote to their approach to groundwater protection in Paragraph 14.22. Additionally, they suggest including an extra bullet point in Paragraph 14.24, requiring a Foundation Works Risk Assessment (FWRA) for development sites proposing deep piled foundations to ensure groundwater risks are understood and mitigated. | The Council welcomes the Environment Agency's support for Policy ENV1 – Environmental Protection. We will include a hyperlink or footnote in Paragraph 14.22 referencing the Environment Agency's approach to groundwater protection. Additionally, we will consider adding a bullet point in Paragraph 14.24 to require a Foundation Works Risk Assessment (FWRA) for development sites proposing deep piled foundations, ensuring that risks to groundwater are properly assessed and mitigated. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | Yes | 01926 | Environment Agency |
| **DM ENV1: Local environmental protection** | Sport England supports the inclusion of the agent of change principle, which protects sport sites from issues like noise from artificial grass pitches affecting new dwellings or ball strikes from cricket sites. They suggest explicitly mentioning the latter example in the policy, potentially under a new safety section, as it is often overlooked by developers. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **DM ENV1: Local environmental protection** | CCLA Investment Management (CCLA) stresses the need for a balance between environmental protection and practical development realities in policy ENV1: Local Environmental Protection. They argue that the draft policy should avoid imposing excessively stringent requirements unless they are thoroughly justified by evidence, as overly onerous conditions could undermine project viability. CCLA advocates for ensuring that environmental policies support sustainable outcomes without placing undue burdens on stakeholders. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **DM ENV1: Local environmental protection** | London Wildlife Trust supports policy ENV1 and recommends adding to paragraph 14.17 that lighting should avoid unnecessary energy use and adverse impacts on road safety and wildlife. Specifically, lighting can disrupt ecosystems of nocturnal species, especially near water and migration paths like the Lee Valley. It is essential to ensure lighting is focused only on intended areas to prevent spillover effects on surroundings. | Support noted. | No | 01974 | London Wildlife Trust |
| **DM ENV1: Local environmental protection** | Enfield Climate Action Forum - Air Pollution Working Group's (EnCaf - APWG) response to the Air Quality Assessment (AQA) highlights concerns that the developments proposed in the Draft Local Plan will mostly negatively impact PM2.5 levels, particularly in the most deprived areas of Enfield. Of the 78 locations assessed, only 4 will benefit, while 56, including 14 schools, will experience moderate adverse impacts. EnCaf - APWG criticizes Policy ENV1: Environmental Protection for failing to address the increase in PM2.5 or propose mitigation measures, despite PM2.5 being a recognized harmful pollutant. Additionally, they criticise Policy SC1: Improving Health and Wellbeing, and consider it does not account for the disproportionate impacts on Enfield's deprived areas. EnCaf - APWG proposes that Policy ENV1 be revised to specifically reference PM2.5 as a pollutant requiring special attention and monitoring, include steps to reduce these emissions, and incorporate the Air Quality Positive Guidance for all site allocations. They also suggest that Policy SC1 be updated to include the AQA findings and outline specific measures to protect communities in deprived areas. Furthermore, EnCaf - APWG recommends that special attention be given to improving air quality in the placemaking areas for Edmonton Green (PL3), Angel Edmonton (PL4), and | Enfield Council acknowledges the concerns raised by EnCaf regarding air quality and the impact of proposed developments on PM2.5 and NO2 concentrations. However, the Council's Environmental Protection Policy (ENV1), as outlined in the Enfield Local Plan and supported by evidence from the Integrated Impact Assessment (IIA), provides a comprehensive framework for addressing air quality issues across the borough.<br><br>Addressing PM2.5 and Other Pollutants: The Environmental Protection Policy prioritizes reducing pollution levels and safeguarding air quality, aligning with both national and London-wide standards. The IIA identifies measures aimed at reducing PM2.5 concentrations, including the adoption of sustainable development practices and increased reliance on low-emission technologies. The Council is committed to adopting Air Quality Positive principles, which are incorporated into the planning framework to mitigate air quality impacts at every stage of site development, particularly in vulnerable areas like Edmonton Green and Meridian Water.<br><br>Focus on Deprived Areas: The IIA and policy ENV1 recognize that deprived areas | No | 02043 | Enfield Climate Action Forum - Air Pollution Working Group (EnCaf - APWG) |

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| | Meridian Water (PL5), as these areas are located in the most deprived parts of Enfield and are near major traffic routes and industrial installations. | of the borough are disproportionately impacted by air pollution. Specific measures are included to address these challenges, such as improving green infrastructure, increasing access to sustainable transport options, and implementing mitigation strategies for developments in these areas. The Council has also emphasized the need to work closely with developers to reduce emissions through the use of green walls, green roofs, and other sustainable design measures, particularly in high-traffic and industrial zones.<br><br>Holistic Approach to Health and Wellbeing: Enfield's policies already integrate health and air quality considerations within the broader context of community wellbeing. Policy SC1: Improving Health and Wellbeing includes provisions for reducing health disparities linked to environmental factors. The Council's ongoing efforts include increasing public awareness, encouraging active travel, and enhancing green spaces to mitigate pollution and improve overall air quality, as highlighted in the IIA.<br><br>Site-Specific Measures: For site allocations like Edmonton Green, Angel Edmonton, and Meridian Water, the Council has proposed specific interventions aimed at reducing air pollution. These areas will benefit from enhanced monitoring, implementation of low-emission zones, and the development of active travel infrastructure that minimizes reliance on motor vehicles, thus directly addressing the air quality issues identified in these high-risk locations.<br><br>In conclusion, the Council's approach is robust and legally compliant, with a clear commitment to reducing air pollution, especially in deprived areas, while supporting sustainable development. The IIA and Policy ENV1 outline clear, actionable measures that address both PM2.5 and NO2 impacts in a targeted and effective manner, ensuring the health and wellbeing of all residents. | | | |
| **DM ENV1: Local environmental protection** | Enfield Climate Action Forum - Air Pollution Working Group's (EnCaf - APWG) response to the Air Quality Assessment (AQA) highlights concerns that the developments proposed in the Draft Local Plan will mostly negatively impact PM2.5 levels, particularly in the most deprived areas of Enfield. Of the 78 locations assessed, only 4 will benefit, while 56, including 14 schools, will experience moderate adverse impacts. EnCaf - APWG criticizes Policy ENV1: Environmental Protection for failing to address the increase in PM2.5 or propose mitigation measures, despite PM2.5 being a recognized harmful pollutant. Additionally, they criticise Policy SC1: Improving Health and Wellbeing, and consider it does not account for the disproportionate impacts on Enfield's deprived areas. EnCaf - APWG proposes that Policy ENV1 be revised to specifically reference PM2.5 as a pollutant requiring special attention and monitoring, include steps to reduce these emissions, and incorporate the Air Quality Positive Guidance for all site allocations. They also suggest that Policy SC1 be updated to include the AQA findings and outline specific measures to protect communities in deprived areas. Furthermore, EnCaf - APWG recommends that special attention be given to improving air quality in the placemaking areas for Edmonton Green (PL3), Angel Edmonton (PL4), and Meridian Water (PL5), as these areas are located in the most deprived parts of Enfield and are near major traffic routes and industrial installations. | Enfield Council acknowledges the concerns raised by EnCaf regarding air quality and the impact of proposed developments on PM2.5 and NO2 concentrations. However, the Council's Environmental Protection Policy (ENV1), as outlined in the Enfield Local Plan and supported by evidence from the Integrated Impact Assessment (IIA), provides a comprehensive framework for addressing air quality issues across the borough.<br><br>Addressing PM2.5 and Other Pollutants: The Environmental Protection Policy prioritizes reducing pollution levels and safeguarding air quality, aligning with both national and London-wide standards. The IIA identifies measures aimed at reducing PM2.5 concentrations, including the adoption of sustainable development practices and increased reliance on low-emission technologies. The Council is committed to adopting Air Quality Positive principles, which are incorporated into the planning framework to mitigate air quality impacts at every stage of site development, particularly in vulnerable areas like Edmonton Green and Meridian Water.<br><br>Focus on Deprived Areas: The IIA and policy ENV1 recognize that deprived areas of the borough are disproportionately impacted by air pollution. Specific measures are included to address these challenges, such as improving green infrastructure, increasing access to sustainable transport options, and implementing mitigation strategies for developments in these areas. The Council has also emphasized the need to work closely with developers to reduce emissions through the use of green walls, green roofs, and other sustainable design measures, particularly in high-traffic and industrial zones.<br><br>Holistic Approach to Health and Wellbeing: Enfield's policies already integrate health and air quality considerations within the broader context of community wellbeing. Policy SC1: Improving Health and Wellbeing includes provisions for reducing health disparities linked to environmental factors. The Council's ongoing efforts include increasing public awareness, encouraging active travel, and | No | 02043 | Enfield Climate Action Forum - Air Pollution Working Group (EnCaf - APWG) |

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| | | enhancing green spaces to mitigate pollution and improve overall air quality, as highlighted in the IIA.<br><br>Site-Specific Measures: For site allocations like Edmonton Green, Angel Edmonton, and Meridian Water, the Council has proposed specific interventions aimed at reducing air pollution. These areas will benefit from enhanced monitoring, implementation of low-emission zones, and the development of active travel infrastructure that minimizes reliance on motor vehicles, thus directly addressing the air quality issues identified in these high-risk locations.<br><br>In conclusion, the Council's approach is robust and legally compliant, with a clear commitment to reducing air pollution, especially in deprived areas, while supporting sustainable development. The IIA and Policy ENV1 outline clear, actionable measures that address both PM2.5 and NO2 impacts in a targeted and effective manner, ensuring the health and wellbeing of all residents. | | | |
| **Chapter 15: Delivering and Monitoring** | | | | | |
| **SP D1: Securing contributions to mitigate the impact of development** | The NHS London Healthy Urban Development Unit (HUDU) supports Policy D1's commitment to securing funds for infrastructure through CIL and s106 contributions. They suggest health infrastructure should be prioritized higher in the Infrastructure Priorities list in figure 15.1, despite its interlinkage with other priorities like air quality and active travel. HUDU recommends that all site allocations mitigate their development's impact on health infrastructure, prioritizing contributions to existing health site capacity. They also suggest that where site allocations include a health facility, the plan should reassess its necessity as it progresses, and s106 agreements should specify design requirements or include a fallback financial contribution if the space cannot meet NHS needs. | The need to address health infrastructure requirements is understood. Providing sufficient health infrastructure is reliant to a large extent in identifying needs arising from development and identifying solutions to meet that need. In absence of this any policy is likely to be generic. It is recognised that greater emphasis could be placed in the Place policies on consistency on health infrastructure. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SP D1: Securing contributions to mitigate the impact of development** | TfL welcomes the requirement for developments to contribute towards improvements at Enfield Town station, although they cannot commit to increased peak hour frequencies. They also support the requirement for car-free development, consistent with the London Plan and considering the PTAL of up to 6a. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SP D1: Securing contributions to mitigate the impact of development** | Sport England recommends listing Sport and Recreation facilities under "other priorities" in Figure 15.1 of the Local Plan. Given the plan's focus on health and wellbeing and the mention of developer contributions in policy CL5, this inclusion would ensure that new developments contribute to meeting the increased demand for sport and physical activity provision, fostering healthier and more physically active communities in Enfield. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SP D1: Securing contributions to mitigate the impact of development** | London borough of Waltham Forest broadly support the matters identified within the emerging Local Plan but urge the Council to remain conscious of the Meridian Water Link to improve cross-boundary connectivity and better connections to transport hubs at Chingford and Ponders End in Enfield. | The Council welcomes the support from the London Borough of Waltham Forest for the matters identified within our emerging Local Plan. The Council acknowledge the importance of the Meridian Water Link to improve cross-boundary connectivity and better connections to transport hubs at Chingford and Ponders End. The Council is committed to working collaboratively to enhance these connections, ensuring our transport infrastructure supports sustainable development and benefits residents in both boroughs. Continued engagement and cooperation will be crucial in realizing these improvements. | No | 02006 | London borough of Waltham Forest |
| **SP D1: Securing contributions to mitigate the impact of development** | CCLA Investment Management (CCLA) emphasizes that policy D1: Securing Contributions to Mitigate the Impact of Development should not impose excessive or cumulative financial requests that could compromise the deliverability of development plans. They stress that local authorities must ensure that the total impact of such contributions does not hinder plan implementation, aligning with paragraph 34 of the NPPF. Any deviation from this principle would conflict with paragraph 35(d) of the NPPF. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local |

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| | | | | | Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **SP D1: Securing contributions to mitigate the impact of development** | CCLA Investment Management (CCLA) supports the allocation of 5 Picketts Lock Lane for industrial redevelopment but recommends several modifications to ensure the policy is feasible and aligns with contemporary needs. They argue that the current requirement for a minimum of 2,297 sqm of additional floor space and the emphasis on multi-level development are impractical given the site's characteristics and modern employment requirements. CCLA suggests updating the Land Use Requirements to include more flexible use classes (E(g)(ii), E(g)(iii), B2, B8) and revising the Design Principles to focus on modernized floorspace, operational efficiency, and sensitivity to the site's context, including residential amenity and environmental considerations. They propose adjustments to the Site Boundary, Site Area, and Design Principles to reflect these changes and ensure that infrastructure requirements do not impede site deliverability. These modifications aim to make the allocation 'justified', 'effective', and 'consistent with national policy' as per NPPF guidelines. | Comments noted. The Council is committed to working collaboratively with CCLA and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **SP D1: Securing contributions to mitigate the impact of development** | Vistry Group supports reducing financial contributions for job loss and apprentice requirements while acknowledging the importance of adjusting financial obligations for inflation. However, they seek clarity on various contributions not listed in Appendix E, such as flood mitigation, public transport, cooling measures, green infrastructure, heritage impacts, conservation appraisals, public art, and EV charging points. Understanding these contributions is essential for assessing site viability and informing proposals. Additionally, they request more details on contributions related to Epping Forest and conservation area appraisals. | The council appreciates Vistry Group's support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **SP D1: Securing contributions to mitigate the impact of development** | Places for London request that Section 4 of Draft Policy SP DI in relation to review mechanisms make reference to and accord with Policy H5 of the London Plan, Threshold Approach to Applications. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **SP D1: Securing contributions to mitigate the impact of development** | NHS Property Services (NHSPS) supports Draft Policy D1, which requies that new developments meet relevant policies and infrastructure requirements in a timely manner, with an allowance for reduced S106 contributions if demonstrated to render the development unviable. NHSPS particularly welcomes Parts 3 and 5, which ensure that developments provide on-site infrastructure or, where not possible, contribute to off-site provisions. They appreciate that planning applications may be refused if nil or reduced contributions make the development unacceptable in planning terms, even after considering alternative funding sources. NHSPS requests continued engagement with the Council to refine healthcare needs and solutions identified in the Infrastructure Delivery Plan (IDP). They emphasize the need for flexibility in determining how to meet healthcare needs, including financial contributions, new on-site infrastructure, free land/infrastructure/property, or a combination thereof. It is crucial that the NHS and its partners collaborate with the Council to formulate appropriate mitigation measures. | The Council appreciates feedback from NHS Property Services and recognizes the importance of addressing key workers' housing needs, including NHS staff. Draft Policy H2 is supported by the Local Housing Need Assessment (2020), the Enfield Housing Topic Paper (2024), and the Site Allocation Topic Paper for Regulation 19 (2024), which comprehensively justify addressing various housing requirements in the borough. The Council acknowledges that housing affordability and availability are crucial for NHS staff recruitment and retention. They will continue engaging with local NHS partners, such as the Integrated Care Board (ICB) and NHS Trusts, to ensure these needs are met in future assessments and site allocations. The Council's Infrastructure Delivery Plan will be updated regularly to reflect current needs, including affordable housing for key workers. The Council is committed to ongoing dialogue to refine policies and support key workers' housing needs, welcoming collaboration through a Statement of Common Ground to achieve these objectives. | No | 01985 | NHS Property Services |
| **SP D1: Securing contributions to mitigate the impact of development** | NHS Property Services (NHSPS) emphasizes the crucial need for adequate healthcare infrastructure to support sustainable development. They argue that a robust Infrastructure Delivery Plan (IDP) must clearly outline the healthcare infrastructure necessary to accommodate the growth proposed in the Local Plan, including effective contributions from planning obligations and the Community Infrastructure Levy (CIL). NHSPS suggests that the Council improve primary healthcare provision by thoroughly assessing existing infrastructure and ensuring | The Council appreciates the detailed feedback from NHS Property Services on Draft Policy D1 and the Infrastructure Delivery Plan (IDP). Recognizing the importance of healthcare infrastructure in sustainable development, the Council commits to ensuring the Local Plan and IDP reflect this priority. The Council welcomes NHSPS's support for Parts 3 and 5 of Draft Policy D1 and agrees on the need for flexibility in meeting healthcare needs from new developments. The IDP will incorporate NHSPS's recommendations to assess demand, collaborate with | No | 01985 | NHS Property Services |

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| | mitigation options meet NHS requirements. They propose additions to Section 3 of the IDP to determine appropriate healthcare contributions, including assessing demand generated by proposals, collaborating with the Integrated Care Board (ICB) to evaluate existing capacity, identifying options to increase capacity, and determining the form of developer contributions. This approach would ensure the IDP effectively supports the necessary healthcare infrastructure for sustainable development. | the Integrated Care Board (ICB), identify capacity-increasing options, and determine appropriate developer contributions. Ongoing engagement with NHSPS and other stakeholders will refine policy details, ensuring the Local Plan and IDP effectively support healthcare services. | | | |
| **SP D1: Securing contributions to mitigate the impact of development** | NHS Property Services (NHSPS) supports the draft policy requirements identified in the Whole Plan Viability Update but notes that the assessment does not specifically account for contributions towards healthcare. The report uses a lump sum for S106 contributions, ranging from £2,500 per unit for small schemes to £9,000 per unit for very large schemes. Although the site-specific testing assumes a base sum of £50,000 per unit for strategic sites, NHSPS is concerned that without explicit mention of healthcare contributions, these might be overlooked or compete with other obligations, compromising the sustainability of development and residents' health. NHSPS recommends including a separate cost input for healthcare contributions in the viability assessment to ensure proper mitigation, inform developers of potential on-site or off-site financial requirements, and support effective implementation of Draft Policy D1. They express willingness to engage further with the Council to establish a reasonable cost assumption for future viability assessments. | The Council acknowledges the NHS Property Services' response and appreciates the support for Draft Policy D1, which is designed to ensure the timely provision of infrastructure. The approach is justified by the Whole Plan Viability Update, which supports the financial contributions towards healthcare infrastructure as necessary and viable within the plan. The Council is committed to further engagement with the NHS to refine healthcare needs and solutions as identified in the Infrastructure Delivery Plan, ensuring sustainable development and adequate healthcare provision in the borough. The Council welcomes collaboration through continuous dialogue to ensure the effective implementation of these policies. | No | 01985 | NHS Property Services |
| **SP D1: Securing contributions to mitigate the impact of development** | Fairview agree with the current measures set out included within this policy and consider the policy should be more ambitious in addressing needs, and suggest amendments to recognise the role of large scale allocated sites in making infrastructure contributions, and prioritise these schemes over small site delivery. | Comments noted. Whilst Enfield Council recognised the critical importance of large scale sites to development in Enfield, small sites are also a vital component of land supply in Enfield, making up over 20% of housing supply in the plan in conformity with London Plan small sites targets. | No | 01746 | Fairview New Homes |
| **SP D1: Securing contributions to mitigate the impact of development** | The Home Builders Federation (HBF) argues that aspects of the policy are unsound and contrary to national policy. They appreciate the Council's prioritisation of affordable housing but note concerns with other priorities. HBF asserts that biodiversity net gain (BNG) of 10% is already a legislative requirement and should not be included in S106 agreements. They oppose the plan's 20% BNG requirement, as only 10% was tested for viability. HBF also recommends removing climate change goals from the list, as these are covered by Building Regulations. Additionally, they argue that skills training is a strategic issue better addressed at a national or London-wide level and not suitable for local planning gain. They suggest concentrating development gains on affordable housing and key infrastructure. | Comments noted. The Council acknowledge HBF's concerns. The Council recognize the legislative requirement for a 10% BNG. The proposed 20% BNG target is intended to exceed basic compliance and our evidence base on viability testing considers various factors impacting the deliverability of development projects, and any adjustments will be made in light of these findings. While Climate Change Goals are integral to our sustainability agenda, we will ensure that they do not duplicate Building Regulations requirements. Our policies aim to support and complement national standards without imposing additional burdens. We understand the importance of addressing skills training at regional and national levels. We will focus local resources more effectively and ensure alignment with broader strategies to support the construction industry. Our approach will be informed by our viability studies to ensure that any requirements do not undermine the overall feasibility of development projects. | Yes | 01851 | Home Builders Federation |
| **DM D3: Infrastructure and phasing** | National Highways acknowledges the need for individual planning applicants to identify necessary infrastructure for their developments and stresses the importance of considering cumulative impacts, as all new activities generate trips. They highlight the requirement in para 51 of the circular for developers to identify necessary transport improvements if a transport assessment indicates severe residual cumulative impacts or unacceptable safety impacts on the SRN. National Highways is currently assessing the full impacts of the Local Plan on the SRN and requires a robust transport assessment and evidence base for both the full plan and significant developments to ensure no residual impacts on the SRN. | The Council acknowledges National Highways' emphasis on the need for individual planning applicants to identify necessary infrastructure for their developments, considering the cumulative impacts of all new activities generating trips. The council understands the requirement in para 51 of the circular for developers to identify necessary transport improvements if a transport assessment indicates severe residual cumulative impacts or unacceptable safety impacts on the SRN. The council appreciate National Highways' ongoing assessment of the Local Plan's full impacts on the SRN and are committed to providing a robust transport assessment and evidence base for both the full plan and significant developments. The council is willing to work closely with National Highways to ensure no residual impacts on the SRN, promoting sustainable and safe transport infrastructure for all. | No | 01753 | National Highways Limited |
| **DM D3: Infrastructure and phasing** | HCC notes the absence of explicit mention of special education provision in the Local Plan and reiterates that Enfield should meet its own special education needs. Hertfordshire will not expand its provision to accommodate growth from outside its area. | Comments noted. | Yes | 01755 | Hertfordshire County Council - SEND |

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| **DM D3: Infrastructure and phasing** | The NHS London Healthy Urban Development Unit (HUDU) welcomes the policy requiring developers to provide a proposed timetable for securing infrastructure delivery. They highlight the need for flexibility due to the unpredictable nature of the Local Plan process, planning applications, and build rates, as well as potential changes in NHS needs and national priorities. HUDU suggests that contributions may need to be redirected to serve the health needs of Enfield's population. They recommend ongoing consultation with the Integrated Care Board (ICB) and NHS Trusts throughout the development process and flexible wording in s106 agreements. They also express interest in participating in pre-application discussions. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **DM D3: Infrastructure and phasing** | Thames Water identifies the omission of a specific policy on wastewater/sewerage and water supply infrastructure in the Enfield Local Plan (ELP). They stress the importance of aligning new development with infrastructure capacity, as outlined in the NPPF. They recommend developers engage with Thames Water early to ensure infrastructure needs are met and suggest conditions on planning permissions for developments requiring off-site upgrades. Thames Water also highlights the necessity of assessing the impact of development near sewage treatment works on residents' amenity and proposes incorporating a policy to address these issues. | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with Thames Water to support responsible development and maintain essential services. | Yes | 01681 | Thames Water |
| **DM D3: Infrastructure and phasing** | Vistry Group acknowledges the importance of infrastructure capacity for future growth but disagrees with the draft policy requiring applicants to demonstrate sufficient infrastructure capacity for the development's lifetime. They argue that assessing critical infrastructure should be the responsibility of the plan-maker, as it often falls under different legislation. Additionally, assessing infrastructure capacity for the entire development lifespan is considered unfeasible due to the need to account for future uncertainties. | The council appreciates Vistry Group’s support and acknowledges the concerns regarding. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **DM D3: Infrastructure and phasing** | The Home Builders Federation (HBF) argues that parts of the policy are unsound and contrary to national policy. The policy requires applicants to demonstrate sufficient infrastructure capacity to support development over its lifetime. HBF contends that it is primarily the plan-maker's responsibility to ensure critical infrastructure availability, as major infrastructure like roads and rail are beyond the control of applicants. They also point out that some infrastructure, like energy and water, is managed under separate statutory regimes and should not hinder development. Lastly, they argue that requiring infrastructure capacity for the entire lifetime of a development is unreasonable and could obstruct planning permission. | Comments noted. The Council agree that ensuring the availability of critical infrastructure is a core responsibility of the plan-maker. The Local Plan incorporates strategic infrastructure planning to address major needs like roads and rail, as detailed in our infrastructure delivery plans.The Council recognize that infrastructure such as energy and water is managed by separate statutory bodies. Policy will ensure that these aspects are coordinated with the relevant authorities to prevent delays in development. While ensuring long-term infrastructure capacity is crucial, the Council understand that requiring capacity for the entire development lifespan may be excessive. | Yes | 01851 | Home Builders Federation |
| **DM D4: Monitoring and review** | The London Borough of Redbridge continues to support clear criteria for reviewing the Local Plan and listing remedial actions for underdelivery. They maintain their previous view from the Regulation 18 stage that Policy D4 should be considered a strategic policy. | Comments noted. The London Borough of Enfield acknowledges the London Borough of Redbridge's support for clear criteria for reviewing the Local Plan and listing remedial actions for underdelivery. The Council also recognize their view that Policy D4 should be considered a strategic policy. Clarification will be included in the Statement of Common Ground. The Council is happy to work with LBR to clarify these points further and ensure mutual understanding and agreement on these matters. | Yes | 01603 | London Borough of Redbridge |
| **DM D4: Monitoring and review** | Fairview note that they agree in principle with the policy, however, they contend that review mechanisms can slow down the overall development process and introduce uncertainty. They therefore think this policy should only be used in ‘exceptional circumstances’ as opposed to ‘where appropriate’ and suggest an amendment to the policy to this effect, suggesting that this will focus the policy on further reviews only when necessary. | Comments noted. The council appreciates Fairview's views on this matter, as a key stakeholder in housing delivery in the borough. However, the current Housing Delivery Test and Housing Delivery Test Action Plan are considered to provide a sufficiently strong and statutory basis for housing monitoring and review. | No | 01746 | Fairview New Homes |
| **Appendix A: Evidence base** | | | | | |
| **Appendix A: Evidence base** | Broxbourne Borough Council has raised concerns about the accuracy of Enfield's traffic modelling, especially regarding the impact of 5,500 new dwellings at Crews Hill and the proposed employment allocation west of Rammey Marsh. | Comments noted. The Council maintains that the Local Plan is sound and based on an up-to-date evidence base, particularly the comprehensive transport modelling detailed in our Movement and Connectivity evidence base. This | No | 00580 | Broxbourne Borough Council |

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| | Broxbourne's previous transport modelling indicated that several junctions would be operating at or near capacity by 2033, which contrasts sharply with Enfield's lower congestion projections. Broxbourne fears this discrepancy may undermine planned transport interventions on the A10 and result in severe highway impacts, making this part of the Local Plan unsound. | modelling, conducted by WSP, aligns with national guidelines and incorporates future growth projections, including developments at Crews Hill and Rammey Marsh. The discrepancies noted by Broxbourne arise from different modelling approaches and assumptions. Enfield remains committed to collaborating with neighboring councils to address cross-boundary transport impacts and ensure sustainable development. The Council is happy to work with the Broxbourne Council to clarify these points further and ensure mutual understanding and agreement on these matters. | | | |
| **Appendix A: Evidence base** | Natural England acknowledges the December 2023 Habitats Regulations Assessment (HRA) prepared by LUC for the Local Plan Regulation 19 consultation. They agree with the HRA's conclusion that without a completed air quality assessment and, if necessary, agreed mitigation, it is not possible to confirm there will be no adverse effects on the integrity of designated sites due to air pollution. They note that paragraph 5.39 of the HRA states the need for mitigation will be identified and agreed with Natural England once the air quality assessment is finalized, and this must be secured before the Local Plan's adoption. Natural England looks forward to continuing discussions with Enfield Council on air quality and collaborating to address these issues. | Comments noted. The council acknowledges Natural England's agreement with the December 2023 Habitats Regulations Assessment (HRA) prepared by LUC and the need for a completed air quality assessment. We recognize the importance of finalizing and securing necessary mitigation measures before the Local Plan's adoption. The council looks forward to ongoing discussions with Natural England to address air quality issues and will be preparing a Statement of Common Ground to address these concerns comprehensively. | Yes | 01743 | Natural England |
| **Appendix A: Evidence base** | Natural England acknowledges the December 2023 Habitats Regulations Assessment (HRA) prepared by LUC for the Local Plan Regulation 19 consultation. They agree with the HRA's conclusion that without a completed air quality assessment and, if necessary, agreed mitigation, it is not possible to confirm there will be no adverse effects on the integrity of designated sites due to air pollution. They note that paragraph 5.39 of the HRA states the need for mitigation will be identified and agreed with Natural England once the air quality assessment is finalized, and this must be secured before the Local Plan's adoption. Natural England looks forward to continuing discussions with Enfield Council on air quality and collaborating to address these issues. | Comments noted. The council acknowledges Natural England's agreement with the December 2023 Habitats Regulations Assessment (HRA) prepared by LUC and the need for a completed air quality assessment. We recognize the importance of finalizing and securing necessary mitigation measures before the Local Plan's adoption. The council looks forward to ongoing discussions with Natural England to address air quality issues and will be preparing a Statement of Common Ground to address these concerns comprehensively. | Yes | 01743 | Natural England |
| **Appendix A: Evidence base** | National Highways reviewed Enfield Council's Strategic Transport Assessment and found it unclear about the Local Plan's transport impacts on the M25, specifically around Junctions 24 and 25. They noted that the assessment doesn't fully capture additional delays and queues at these junctions, which could affect the main carriageway. National Highways has discussed these potential impacts with Enfield Council and their consultants, requesting a more detailed examination of the delays. They are awaiting further transport modelling evidence to determine if the Local Plan is sound concerning impacts at M25 Junctions 24 and 25. | The Council acknowledges National Highways' review of the Strategic Transport Assessment and the concerns raised regarding the Local Plan's transport impacts on the M25, particularly around Junctions 24 and 25. The council appreciate the discussions held with National Highways and our consultants, and we recognize the importance of providing a more detailed examination of potential delays and queues at these junctions. The Council is committed to working collaboratively with National Highways to address these concerns and will provide the necessary transport modelling evidence to ensure the Local Plan is sound concerning impacts at M25 Junctions 24 and 25. The council look forward to continued engagement to ensure a robust and effective transport strategy. | No | 01753 | National Highways Limited |
| **Appendix A: Evidence base** | National Highways reviewed the Infrastructure Development Plan, which identifies current and future transport provision and gaps for sustainable development. They noted the absence of significant references to electric vehicle (EV) charging in both the report and the Local Plan, despite the mention of the DfT Electric Vehicle Infrastructure Strategy. National Highways emphasized their commitment to achieving net-zero for vehicles on the SRN by 2050, with EVs being crucial to this goal. They requested further details on the implementation of EV charging infrastructure through planning policy to assess the Plan's contribution to the Government's Net Zero Strategy. | The Council appreciates National Highways' review of the Infrastructure Development Plan and their emphasis on the importance of electric vehicle (EV) charging infrastructure. The council recognize the crucial role of EVs in achieving the Government's Net Zero Strategy and are committed to supporting this goal. The council acknowledge the absence of significant references to EV charging in the current documents and will ensure that the Local Plan and Infrastructure Development Plan are updated to include comprehensive details on the implementation of EV charging infrastructure. This will encompass strategies that promote the integration of EV charging facilities in new developments and public spaces. The council look forward to continued collaboration with National Highways to ensure our planning policies effectively contribute to sustainable development and the Government's net-zero targets. | No | 01753 | National Highways Limited |
| **Appendix A: Evidence base** | National Highways is awaiting further details on the transport impacts at M25 Junctions 24 and 25 to determine if there is an unacceptable impact and a need to future-proof the network, as per Paragraphs 51 and 52 of DfT Circular 01/2022. They will provide further feedback after reviewing the forthcoming evidence. If physical mitigation is required, it will need an assessment of implementation phasing, designs, safety, and DMRB compliance, along with identified funding | The Council acknowledges National Highways' review and the necessity for further details on the transport impacts at M25 Junctions 24 and 25. The council is committed to providing the required additional transport modelling evidence to determine any potential unacceptable impacts and the need for network future-proofing in line with Paragraphs 51 and 52 of DfT Circular 01/2022. Should physical mitigation be necessary, the council will conduct thorough assessments | No | 01753 | National Highways Limited |

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| | sources to ensure delivery feasibility. A 'monitor and manage' strategy may be needed, which will be discussed and included in a Statement of Common Ground (SoCG). | covering implementation phasing, design, safety, and DMRB compliance, along with identifying funding sources to ensure feasibility. The council is open to incorporating a 'monitor and manage' strategy and will ensure these considerations are discussed and included in a Statement of Common Ground (SoCG) with National Highways. The council appreciate their continued collaboration and support in ensuring the Enfield Local Plan meets all necessary transport infrastructure requirements. | | | |
| **Appendix A: Evidence base** | HCC's response to the December 2023 Habitats Regulations Assessment (HRA) for the Regulation 19 Plan indicates limited impacts on SAC and SPA sites in Hertfordshire and Essex. The Appropriate Assessment found no adverse effects on Lee Valley SPA and Ramsar site for physical damage, loss, or non-physical disturbance. However, air pollution and recreational pressure effects on Epping Forest SAC, Lee Valley SPA, Ramsar site, and Wormley Hoddesdonpark Woods SAC are uncertain pending further information. Natural England will provide formal comments as the statutory consultee | Comments noted. The Council acknowledges the findings of the Habitats Regulations Assessment (HRA) and the concerns raised regarding SAC and SPA sites. The Council is actively engaging with Natural England to address these issues and are in the process of signing a Statement of Common Ground (SoCG) with them to ensure all concerns are adequately addressed and the development complies with environmental regulations and best practices. | No | 01755 | Hertfordshire County Council - Ecology |
| **Appendix A: Evidence base** | Historic England's comments on the Character of Growth Study suggest that additional views be considered in relation to Gentlemen's Row, a historically significant area with a cluster of listed buildings representing some of the earliest development in Enfield Town. Currently, most views focus west or are located near the southern side of the gardens. Historic England recommends that further views be assessed, particularly those looking east and southeast from the gardens and the upper section of Gentlemen's Row. These views should show the potential impact of developments, such as Palace Gardens and the Enfield Civic Centre, on the skyline over the rooftops of the listed buildings. Given that the viewing positions and directions outlined in this document will inform the scope of visuals supporting future development applications, it is crucial that they thoroughly illustrate the potential visual impacts on heritage assets. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **Appendix A: Evidence base** | Historic England's comments on the Character of Growth Study suggest that views need to be considered from the terrace outside the café within the Grade II* Registered Park and Garden of Grovelands Park. This raised area affords significant views looking west over the park and of the Grade I listed Nash villa. These views are an integral part of the significance of both heritage assets. Historic England would be likely to object to any development that appears in those views. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **Appendix A: Evidence base** | Historic England's comments on the Character of Growth Study suggest that the projection of new development over the rooftop silhouette of the former Friern Hospital is considered harmful to its architectural significance and setting. This is a well composed expansive and symmetrical composition. Details can be found at: https://historicengland.org.uk/listing/the-list/list-entry/1078848. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **Appendix A: Evidence base** | Based on a review of the draft London Borough of Enfield Local Plan and the submitted evidence base, the Environment Agency finds the submission unsound. The evidence base is not adequately justified, and several site allocations are inconsistent with national policy. The Level 2 Strategic Flood Risk Assessment (July 2023) highlights that numerous sites have failed the sequential and/or exceptions tests, yet they have still been proposed as site allocations in the Regulation 19 submission. This is contrary to national policy outlined in paragraphs 168 and 171 of the National Planning Policy Framework (NPPF), which states that sites failing these tests should not be allocated. The Environment Agency strongly recommends that the Council updates the Level 2 SFRA in accordance with current guidance and removes any sites that continue to fail these tests from the site allocations. Further advice and guidance are available in the Environment Agency's full representation submitted via email on 20th May. | The Council acknowledges the Environment Agency's concerns regarding site allocations and the issues raised in the Level 2 Strategic Flood Risk Assessment (July 2023). We are committed to working collaboratively with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | No | 01926 | Environment Agency |
| **Appendix A: Evidence base** | The Environment Agency (EA) finds the draft Local Plan unsound, stating the evidence base is not justified, and site allocations are inconsistent with national policy. Several sites have failed the sequential and/or exceptions test according to | The Council acknowledges the Environment Agency's concerns regarding site allocations and the issues raised in the Level 2 Strategic Flood Risk Assessment (July 2023). We are committed to working collaboratively with the Environment | No | 01926 | Environment Agency |

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| | the Level 2 Strategic Flood Risk Assessment (L2 SFRA) and should not be allocated. The EA recommends a new L2 SFRA, using the latest reference numbers and ensuring all relevant sites are assessed and failing sites are deleted. | Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | | | |
| **Appendix A: Evidence base** | The Environment Agency has concerns regarding the lack of clarity in the modelling used within the Level 2 Strategic Flood Risk Assessment (SFRA), particularly in relation to key factors such as speed of onset, velocity, and flood depth. Additionally, there appears to be an inadequate assessment of reservoir data and its potential impact on flood risk for downstream developments. To address these issues, the Environment Agency strongly recommends the inclusion of a clear user guide to accompany the L2 SFRA, providing detailed explanations of the modelling methodology and ensuring that all flood risk elements are comprehensively assessed. | The Council acknowledges the Environment Agency's concerns regarding site allocations and the issues raised in the Level 2 Strategic Flood Risk Assessment (July 2023). We are committed to working collaboratively with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with guidance, and reconsider site allocations where necessary to ensure compliance with national policy. | No | 01926 | Environment Agency |
| **Appendix A: Evidence base** | The Department for Education (DfE) states that under the Education Act 2011 and the Academies Act 2010, new state schools are now academies/free schools, with DfE as the delivery body rather than local authorities. Local authorities, however, retain the responsibility for ensuring sufficient education provision and securing contributions from development. DfE aims to collaborate closely with local education departments and planning authorities to meet the demand for new education infrastructure and has provided guidance on securing developer contributions and estimating pupil yields. The DfE supports the Council's policy SC2 on safeguarding land for schools but finds the plan unsound regarding the level of developer contributions towards education. Enfield's Draft Local Plan proposes a contribution of £3,324 per dwelling, whereas DfE guidance suggests the cost should be £11,960 per dwelling based on current pupil yield data and school place costs. The DfE recommends Enfield clarify their methodology to accurately reflect pupil yields and costs, ensuring that the total cumulative cost of complying with policies does not undermine plan deliverability. Without these modifications, the DfE considers the plan not positively prepared and lacking a justified and effective approach to education provision. | Enfield's viability evidence shows that setting developer contributions too high can make projects financially unfeasible, potentially hindering housing delivery and other developments. The Local Plan aims to balance necessary education contributions with development viability, proposing a contribution of £3,324 per dwelling. This figure is based on a comprehensive assessment of infrastructure needs and market conditions, ensuring contributions are fair and sustainable. Enfield's approach is pragmatic, considering the impact on project viability, and includes flexibility to adjust contributions as needed. The Council is committed to collaborating with the DfE and local education authorities to address education infrastructure effectively while maintaining plan deliverability. | No | 01972 | Department for Education |
| **Appendix A: Evidence base** | The Diocese of London highlights that, according to the Infrastructure Delivery Plan (IDP), Enfield currently meets mainstream primary and secondary school needs across most areas. However, there is an urgent need for additional Special Educational Needs and Disabilities (SEND) provision. The IDP indicates that increasing mainstream schools is crucial to delivering additional SEND provision. The Diocese supports the IDP findings and emphasizes the suitability of their site to help meet these identified needs. They argue that their site has the potential to facilitate the expansion of SEND school facilities and should be considered for release from the Green Belt to achieve this goal. | Comments regarding the need for additional Special Educational Needs and Disabilities (SEND) provision within the Borough is noted. The Council acknowledge the urgency of addressing this need as highlighted in the Infrastructure Delivery Plan (IDP). The IDP recognizes the current challenges in mainstream primary and secondary school capacity across most areas of Enfield, with a specific emphasis on the growing demand for SEND provision. Enhancing mainstream schools is essential to expanding SEND capacity, a priority reflected in Enfield's planning. Regarding the Diocese's proposal to consider their site for Green Belt release to support SEND provision expansion, it is essential to recognise that Enfield's approach to site allocation and Green Belt release is informed by rigorous assessments and strategic planning. As detailed in the Site Allocation Topic Paper for Regulation 19, Enfield's site assessment process prioritizes sustainable development patterns and carefully evaluates sites based on various criteria, including accessibility, environmental impact, and potential to meet the Borough's needs comprehensively. The plan's strategy involves a sequential approach that prioritizes: 1) Land within the urban area. 2) The most accessible sites in the Green Belt, considering previously developed land first. 3) The least accessible and isolated Green Belt land, also prioritizing previously developed sites. While the council appreciate the potential of the Diocese's site to contribute to meeting SEND needs, the council must balance this against the broader objectives of sustainable development and maintaining the integrity of the Green Belt. Additionally, it is important to highlight that the IDP is a living document. This means it is continually updated to reflect changing needs and priorities, ensuring that Enfield remain responsive to emerging issues such as the need for SEND provision. The council encourage continued engagement and collaboration to explore potential solutions that align with both our educational and environmental goals. The council appreciate the Diocese's input and look forward | No | 01744 | Diocese of London |

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| | | to further discussions to ensure that we meet the educational needs of our community effectively while adhering to our strategic planning principles. | | | |
| **Appendix A: Evidence base** | The Diocese of London's response highlights that the Infrastructure Delivery Plan (IDP) identifies a need for increased renewable energy provision to meet Enfield's carbon-neutral target by 2040. However, they note that the IDP does not specify clear targets for new renewable energy developments. They encourage the Council to establish clear targets for renewable infrastructure delivery across different energy sources. | The council acknowledge and appreciate the Diocese of London's support for our Infrastructure Delivery Plan (IDP) and its emphasis on renewable energy provision. The Council is committed to achieving its carbon-neutral target by 2040 and recognises the importance of renewable energy in this endeavor. The IDP, as a living document, is designed to evolve and adapt based on emerging data, technological advancements, and stakeholder feedback. The council will take into consideration the recommendation to establish clearer targets for renewable infrastructure delivery across different energy sources. This will ensure that we have a more defined pathway to increasing our renewable energy capacity and meeting our carbon-neutral goals. Furthermore, the council's approach and detailed strategies for site allocations and infrastructure needs are justified and supported by comprehensive evidence, as outlined in the Site Allocation Topic Paper. The council will continue to work collaboratively with all stakeholders, including the Diocese of London, to refine Enfield's policies and targets, ensuring they are both ambitious and achievable. The Council look forward to ongoing engagement and collaboration to enhance our Local Plan and support sustainable growth in the Borough. | No | 01744 | Diocese of London |
| **Appendix A: Evidence base** | Lansdown highlights the need for more detailed viability assessments for different parts of the site, particularly those delivering flats or housing and for specialist housing for older people. They express willingness to continue working with the Council to refine the approach. | The Chase Park Topic Paper (2024) and the Enfield Viability Update both highlight the Council's commitment to ensuring that all proposed developments are financially viable while meeting housing and sustainability objectives. The Enfield Viability Update takes into account the diverse types of housing required in the borough, including specialist housing for older people, and evaluates the financial feasibility of different development types. The Council recognises that certain areas may require more specific assessments to address unique challenges such as the delivery of affordable housing, the provision of public services, and the sustainability of specialist housing developments. The Council welcomes Lansdown's willingness to continue collaborating with the Council to refine the approach to viability assessments, and we are committed to working with you to ensure that all aspects of the development are viable and in line with the Council's broader goals for the Enfield Local Plan. The Council will ensure that ongoing viability studies remain a priority, helping to support housing delivery while addressing the needs of all community members, including older people. | No | 01998 | Landsdown |
| **Appendix A: Evidence base** | Troy Planning + Design on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood Forum (HWNF) points out inconsistencies in the Council's supporting documents, particularly the Integrated Impact Assessment, which shows that the site performs poorly against sustainability indicators. | Comments noted. The Integrated Impact Assessment (IIA) dentifies some negative effects of the RUR.02 allocation, but also highlights the site's potential contributions to meeting housing needs. The assessment considers a wide range of factors, balancing the site's challenges with the overall benefits to the borough. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **Appendix A: Evidence base** | A copy of the Hadley Wood Neighbourhood Plan is submitted as part of Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum. | Comments noted. The Local Plan reflects a balanced approach to meeting housing needs, protecting the environment, and ensuring sustainable development. The decisions regarding Green Belt sites were not made lightly but were the result of thorough analysis and consultation. The Council will continue engaging with the HWNPF to address their specific concerns through a statement of common ground. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **Appendix A: Evidence base** | The Enfield Conservative Group submits a copy of the council's Green Belt and MetropolitanOpen Land Study prepared by LUC. | Recieved with thanks. | No | 01670 | Enfield's Conservative Group |
| **Appendix B: Key Performance Indicators** | | | | | |
| **Appendix B: Key** | Better Homes Enfield critiques the Key Performance Indicators (KPIs) outlined in Appendix B.1 of the draft Enfield Local Plan (ELP), arguing that they are | Comments noted. It is important to note that policies within the Enfield Local Plan need to be read as a whole rather than in isolation. This integrated approach | Yes | 01708 | Better Homes Enfield |

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| **Performance Indicators** | insufficient to ensure that the goals of sustainable development and "Good Growth" as defined by the National Planning Policy Framework (NPPF) and London Plan 2021 are met. The group emphasizes that the KPIs are vague, lacking clarity on what will be measured and how it will be tracked over time. It points out that the KPIs should report cumulatively from the start of the plan period (2019/20) to provide a clear picture of whether the ELP's objectives are being delivered. Specific concerns include the need for more detailed reporting on housing, employment, and environmental metrics, such as separate tracking of housing types, the number of jobs created locally, and the impact of development on green spaces. The group recommends several modifications to make the KPIs more robust and aligned with the ELP's strategic goals. It suggests adding new KPIs to monitor critical areas like housing mix, affordable housing, employment, and the provision of green infrastructure. For instance, it calls for separate metrics for different types of affordable housing, tracking the number of homes lost and gained through various means, and monitoring the impact of development on open spaces and community facilities. The document also highlights the importance of including cumulative reporting to ensure that the plan's overall impact can be assessed accurately. These changes are recommended to ensure the ELP is legally compliant with the London Plan and sound according to the NPPF's standards. | ensures comprehensive planning and development. The group's concerns about housing numbers, affordable housing, open space, active travel, employment targets, and monitoring mechanisms are noted. The policies collectively address these areas, ensuring alignment with the London Plan and national policies. We will consider theirsuggestions to enhance clarity and effectiveness in the Local Plan, ensuring it meets all stakeholders' needs. | | | |
| **Appendix B: Key Performance Indicators** | The Enfield Society's concerns with Key Performance Indicator Number 2 for heritage are that it should not only track the number of designated or non-designated heritage assets lost or harmed but also include the broader historic environment and Conservation Areas. Additionally, they believe it should monitor the submission of Heritage Statements for all proposals affecting the historic environment to ensure consistency with national policy and the London Plan. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **Appendix C: Site Proformas** | | | | | |
| **SA1.1: Palace Gardens Shopping Centre** | Historic England recommends adding more detailed design principles for heritage-sensitive areas, clarifying GLAAS consultation requirements, and providing an explanation of the colour coding in the heritage considerations boxes. For Policy SA1.1, under the design principles, they suggest introducing a new bullet point (M): "Must demonstrate how the development has responded to the significance of potentially affected heritage assets and taken appropriate account of the guidance in the Character of Growth study, as well as relevant conservation area appraisals and conservation area management plans." | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SA1.1: Palace Gardens Shopping Centre** | The NHS London Healthy Urban Development Unit (HUDU) welcomes that site allocations SA1.1, SA1.2 and SA1.3 state that developers should contribute towards a new health centre. It is stated that there is potential for a healthcare facility within the Enfield Civic centre site allocation (SA1.4). They would therefore request to be kept informed and update with any pre-application plans for any of these sites. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SA1.1: Palace Gardens Shopping Centre** | TfL recommends early consultation for any development proposals that may impact station access, management, or London Overground operations. They welcome the requirements for improving pedestrian and cycle routes to Enfield Town Overground station and enhancing station facilities, though they cannot commit to increased peak hour frequencies. TfL supports limiting vehicular access to drop-off, servicing, and accessible bays, but suggests amending the wording to | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| | explicitly state "car-free development" to ensure consistency with the London Plan, considering the PTAL of up to 6. | | | | |
| **SA1.1: Palace Gardens Shopping Centre** | For site SA.1.1, Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA1.1: Palace Gardens Shopping Centre** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA1.1: Palace Gardens Shopping Centre** | For site SA.1.1, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA1.1: Palace Gardens Shopping Centre** | LBESPS supports the allocation of Palace Gardens Shopping Centre (SA1.1) for comprehensive mixed-use redevelopment, including commercial and residential uses, as well as public realm and environmental improvements. They endorse the proposed residential typologies and inclusion of tall buildings, subject to detailed design and amenity considerations. They support improvements to Enfield Town Overground Station facilities, in coordination with Transport for London. The anticipated development timeframe of up to 10 years is supported, highlighting the site's sustainability and accessibility, and emphasizing its prioritization for development. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SA1.1: Palace Gardens Shopping Centre** | Better Homes Enfield critiques the Enfield Local Plan's (ELP) site allocation for the Palace Gardens Shopping Centre (SA1.1), arguing that it does not comply with the London Plan 2021 or the National Planning Policy Framework (NPPF). The group suggests that the current allocation of 88 dwellings per hectare (dph) is too low for such a sustainable, centrally located brownfield site, especially when compared to other urban brownfield sites and even suburban extensions like Chase Farm Hospital, which achieves a higher density. The group also notes that the site allocation only considers Palace Gardens and not the combined area of Palace Gardens and Palace Exchange, which would increase the total area from 2.3 hectares to 3.73 hectares. Furthermore, the group highlights the potential for including adjacent sites, such as the BT Exchange on Cecil Road, to further optimize the site's housing capacity. To address these concerns, the group recommends increasing the housing density to 125 dph, which would still be relatively low compared to other similar site allocations but would better reflect the site's potential and constraints. This adjustment could result in delivering 450 homes—121 more than currently estimated. Additionally, they suggest that the ELP should consider the possibility of land assembly by incorporating adjacent sites like the BT Exchange, which could further enhance the site's development potential. By doing so, the site allocation could better align with the London Plan's | Comments noted. The Palace Gardens Shopping Centre site allocation (SA1.1) is part of a strategic effort to optimize land use within Enfield's urban centers, particularly in areas well-served by public transport and existing infrastructure. The current density of 88 dwellings per hectare (dph) reflects a balanced approach that takes into account the site's unique characteristics, including its proximity to heritage assets, the conservation area, and the need to maintain the character of the surrounding area. The Site Allocation Topic Paper recognises the importance of ensuring that development within sensitive urban environments, such as Palace Gardens, is carefully managed to prevent adverse impacts on local heritage and character. This conservative density approach aligns with the London Plan's emphasis on a design-led approach, which prioritizes the most appropriate form of development for each site based on its context and constraints. Regarding the omission of the BT Exchange site on Cecil Road from the Palace Gardens site allocation, the Site Allocation Topic Paper explains that not all potentially developable sites are included within specific site allocations due to various factors, including land ownership, site availability, and the current stage of planning. While the BT Exchange was identified as "potentially developable" in the Housing and Employment Land Availability Assessment (HELAA), its inclusion in the Palace Gardens site allocation was not pursued due to its separate ownership and the absence of an immediate development proposal that aligns with the | Yes | 01708 | Better Homes Enfield |

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| | policies on optimizing site capacity and making effective use of land, thereby meeting the NPPF's soundness criteria. | broader objectives for the Palace Gardens area. The ELP focuses on delivering viable, deliverable sites within the plan period, and while the potential for land assembly exists, it is contingent on further stakeholder engagement and alignment with the overall site strategy. The council maintains that the current approach to the Palace Gardens Shopping Centre site allocation seeks to balance the need for housing delivery with the preservation of Enfield's unique urban character. The decision not to include the BT Exchange site reflects practical considerations related to land ownership and development timing, ensuring that the ELP remains focused on achievable and contextually appropriate site allocations. | | | |
| **SA1.1: Palace Gardens Shopping Centre** | The Enfield Society's concerns about the proposed tall buildings at the Palace Shopping Centre revolve around the potential harm to the character of Enfield Town's Conservation Area, described as having a 'charming market town' character. They argue that the development could negatively affect views, including those from key heritage assets such as the Old Vestry Office and Barclays Bank, as well as various locations around Church Street and Market Square. The Society is concerned that the Vucities modelling does not accurately represent the potential impact on these views and that the actual harm could be greater than anticipated. They also question the need for regeneration in this area, given the high occupancy levels and the sympathetic modern extension of the Palace Shopping Centre. Moreover, the Society highlights inconsistencies within the plan regarding building heights and fears that redevelopment could lead to the loss of anchor stores, negatively impacting the town's economy. They conclude that a policy for the Palace Shopping Centre is unnecessary and that redevelopment risks outweigh the proposed benefits. | The Enfield Local Plan recognizes the importance of safeguarding heritage assets. The development principles in Design Principles H and I seek to balance the need for growth with the protection of these sensitive areas. The use of the term "consider" in the context of long views and the siting of tall buildings emphasizes a careful, case-by-case approach that allows for flexibility while ensuring heritage impacts are thoroughly assessed. The Site Allocation Topic Paper provides further clarification by outlining the detailed assessments undertaken to ensure that developments are aligned with both local and national heritage conservation standards. As part of the development process, full heritage impact assessments will be required, particularly for sites near designated heritage assets, to mitigate any adverse effects. The Council is committed to refining these principles as the Local Plan progresses to ensure robust protection of Enfield's heritage while facilitating sustainable development. | No | 01794 | Enfield Society |
| **SA1.2: Enfield Town Station and Former Enfield Arms** | Historic England recommends enhancing the design principles for heritage-sensitive areas, clarifying GLAAS consultation requirements, and/or providing an explanation of the colour coding in the heritage considerations boxes where relevant. For Policy SA1.2, under the design principles, they suggest adding a new bullet point (K): "Development proposals must demonstrate how they have responded to the significance of any potentially affected heritage assets." | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SA1.2: Enfield Town Station and Former Enfield Arms** | The NHS London Healthy Urban Development Unit (HUDU) welcomes that site allocations SA1.1, SA1.2 and SA1.3 state that developers should contribute towards a new health centre. It is stated that there is potential for a healthcare facility within the Enfield Civic centre site allocation (SA1.4). They would therefore request to be kept informed and update with any pre-application plans for any of these sites. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SA1.2: Enfield Town Station and Former Enfield Arms** | TfL welcomes the requirement for developments to improve pedestrian and cycle routes to Enfield Town station and facilitate station facility improvements. However, they suggest changing the wording from "should facilitate improvements" to "must facilitate improvements" for consistency with SA1.1 and SA1.2. They cannot commit to increased peak hour frequencies. Regarding parking, TfL notes the requirement for limited parking but recommends amending it to state that parking must be minimized for all proposed uses, including residential and the re-provided retail store, to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA1.2: Enfield Town Station and Former Enfield Arms** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA1.2 (Enfield Town station and former Enfield Arms) as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate | The council welcomes the detailed feedback regarding Site SA1.2 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA1.2, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |

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| | that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | | | | |
| **SA1.2: Enfield Town Station and Former Enfield Arms** | Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA1.2: Enfield Town Station and Former Enfield Arms** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA1.2: Enfield Town Station and Former Enfield Arms** | For site SA.1.2, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA1.2: Enfield Town Station and Former Enfield Arms** | The Enfield Society raises several concerns about the proposed tall buildings as outlined in Design Principles H and G. They argue that a tall building of up to 42m above the station entrance and additional height up to 33m adjacent to the railway line would significantly harm the small-scale character of Genotin Terrace and the historic environment of Church Street. The creation of a cluster of tall buildings, where currently only one exists, would alter the market town character of the adjacent Conservation Area. The Enfield Society suggests that lower building heights, possibly only 6 storeys, would be more in character with the town center. Additionally, they express concerns about the cumulative impact of multiple tall buildings on the Conservation Area's character. The policy wording, according to the Society, would not effectively reduce or avoid harm to the Conservation Area if the principle of tall buildings is established. | The Enfield Local Plan recognizes the importance of safeguarding heritage assets. The development principles in Design Principles H and I seek to balance the need for growth with the protection of these sensitive areas. The use of the term "consider" in the context of long views and the siting of tall buildings emphasizes a careful, case-by-case approach that allows for flexibility while ensuring heritage impacts are thoroughly assessed. The Site Allocation Topic Paper provides further clarification by outlining the detailed assessments undertaken to ensure that developments are aligned with both local and national heritage conservation standards. As part of the development process, full heritage impact assessments will be required, particularly for sites near designated heritage assets, to mitigate any adverse effects. The Council is committed to refining these principles as the Local Plan progresses to ensure robust protection of Enfield's heritage while facilitating sustainable development. | No | 01794 | Enfield Society |
| **SA1.3: Tesco, Southbury Road** | The NHS London Healthy Urban Development Unit (HUDU) welcomes that site allocations SA1.1, SA1.2 and SA1.3 state that developers should contribute towards a new health centre. It is stated that there is potential for a healthcare facility within the Enfield Civic centre site allocation (SA1.4). They would therefore request to be kept informed and update with any pre-application plans for any of these sites. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SA1.3: Tesco, Southbury Road** | TfL welcomes the requirement for developments to facilitate improvements to Enfield Town station facilities but suggests changing the wording from "facilitate improvements" to "must facilitate improvements" for consistency with SA1.1 and SA1.2. They cannot commit to increased peak hour frequencies. Regarding parking, TfL notes the requirement for limited parking but recommends amending it to state that parking must be minimized for all proposed uses, including residential and the re-provided civic centre, to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| **SA1.3: Tesco, Southbury Road** | For site SA.1.3, Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA1.3: Tesco, Southbury Road** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA1.3: Tesco, Southbury Road** | For site SA1.3, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA1.3: Tesco, Southbury Road** | Better Homes Enfield critiques the Enfield Local Plan's (ELP) site allocation SA1.3 for Tesco Southbury Road, arguing that it may not be legally compliant with the London Plan 2021. The critique emphasizes that the site allocation does not optimize the site's potential for housing delivery, as required by London Plan Policies D3 and H1. These policies require developments make the best use of land through a design-led approach, especially on brownfield sites within 800 meters of a railway station. The document suggests that incorporating adjacent sites, such as the Royal Mail depot and Savoy Parade properties, into the site allocation could significantly increase the housing capacity from the currently allocated number, potentially adding 85-115 more homes, resulting in a total of over 400 homes. To address these issues, the document recommends modifying the site allocation to include the adjacent Royal Mail site and other nearby properties. This land assembly approach would optimize the site's housing capacity, ensuring that the allocation aligns with the London Plan's requirements for maximizing housing potential on suitable brownfield sites. By doing so, the ELP would better meet the soundness criteria set out in the National Planning Policy Framework (NPPF), particularly in terms of promoting effective land use and meeting local and regional housing needs. | Comments noted. The allocation of the Tesco Southbury Road site is informed by a strategic approach that carefully considers the site's current use, potential for redevelopment, and broader urban planning goals. While the London Plan encourages optimizing site capacity through a design-led approach, the ELP's allocation reflects a balanced consideration of various factors, including existing land uses, infrastructure capacity, and community impact. The Site Allocation Topic Paper highlights that while the inclusion of adjacent sites, such as the Royal Mail depot, could potentially increase housing capacity, the current allocation is designed to be achievable and reflective of realistic development potential within the current planning context. The allocation of 1.74 hectares for this site is intended to deliver a sustainable and contextually appropriate development that aligns with the site's urban environment and infrastructure capacity. Additionally, the ELP's flexible planning framework allows for future adjustments to site allocations based on emerging opportunities and detailed planning assessments. The potential for land assembly, including the Royal Mail site, could be explored as part of ongoing and future planning processes, where a more comprehensive development strategy could be implemented. The current allocation does not preclude the possibility of revisiting and optimizing the site's capacity as conditions and opportunities evolve. This approach ensures that the ELP remains responsive to both local needs and regional planning objectives, while maintaining compliance with the London Plan's policies on housing delivery and site capacity optimization. In summary, the allocation for Tesco Southbury Road in the ELP reflects a cautious and realistic approach to site development, balancing the need for housing delivery with practical considerations of land use and infrastructure. While there is potential for future optimization through land assembly, the current allocation is consistent with the principles of sustainable development as outlined in the London Plan and the National Planning Policy Framework (NPPF). The ELP's flexibility allows for future revisions, ensuring that the site can fully contribute to Enfield's housing needs in a manner that is both achievable and strategically sound. | Yes | 01708 | Better Homes Enfield |

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| **SA1.4: Enfield Civic Centre** | The NHS London Healthy Urban Development Unit (HUDU) welcomes that site allocations SA1.1, SA1.2 and SA1.3 state that developers should contribute towards a new health centre. It is stated that there is potential for a healthcare facility within the Enfield Civic centre site allocation (SA1.4). They would therefore request to be kept informed and update with any pre-application plans for any of these sites. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SA1.4: Enfield Civic Centre** | TfL welcomes the requirement for a car-free development but suggests it be amended to "must be a car-free development" to ensure consistency with the London Plan, considering the PTAL of up to 5. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA1.4: Enfield Civic Centre** | LBESPS supports the allocation of Enfield Civic Centre (SA1.4) for redevelopment, which includes reprovision of office space for civic use, new residential homes, and a potential new health centre. They recommend flexibility in the health centre provision, subject to discussions with stakeholders. They also support improvements to Enfield Town Overground Station facilities. The policy's estimated capacity of 114 new homes is acknowledged, subject to detailed design. The timeframe of up to 10 years is supported, emphasizing the site's sustainability, accessibility, and prioritization for development. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SA1.4: Enfield Civic Centre** | Better Homes Enfield critiques the site allocation SA1.4 for the Enfield Civic Centre in the Enfield Local Plan (ELP), arguing that it may not be legally compliant with the London Plan 2021. The critique focuses on the fact that the current site allocation does not optimize the potential housing capacity, as required by London Plan Policies D3 and H1, which emphasize the importance of maximizing site capacity through a design-led approach, particularly on brownfield sites near transport hubs. The group also highlights the missed opportunity for land assembly, specifically the potential to include the adjacent disused police station site. The combined site could potentially deliver approximately 100 additional homes, making better use of the highly sustainable town center location. To address these concerns, the group recommends modifying the site allocation to reflect the potential of the wider area by including the adjacent police station site. This would align the allocation with the London Plan's requirements and the National Planning Policy Framework (NPPF), which both emphasize the effective use of land, particularly brownfield sites. By pursuing land assembly and optimizing the site's capacity, the ELP would better meet local and regional housing needs while ensuring that the site allocation is legally compliant and sound according to national and regional planning policies. | Comments noted. The allocation of the Enfield Civic Centre site reflects a strategic approach that balances the need for housing delivery with the preservation of essential public sector functions and urban design considerations. The Site Allocation Topic Paper highlights that the Civic Centre site is already identified for significant redevelopment, but it must also continue to serve as a key public service hub for the borough. The current allocation of housing on this site takes into account the need to maintain the Civic Centre's role in providing public services while allowing for an appropriate level of residential development that aligns with local infrastructure capacity and urban design principles. Regarding the suggestion of including the adjacent disused police station site for potential land assembly, the Site Allocation Topic Paper indicates that site allocations must be realistic and achievable within the plan period. While the potential for land assembly, including the police station site, could indeed increase housing capacity, such an approach requires careful consideration of ownership, site availability, and the feasibility of acquiring additional land. The current allocation is designed to be flexible, allowing for potential future revisions as part of an ongoing strategic assessment of land use in the town center. This phased approach ensures that the site development remains sustainable, legally compliant, and aligned with both the London Plan and the National Planning Policy Framework (NPPF). In summary, the allocation for the Enfield Civic Centre in the ELP is consistent with the strategic goals of the borough, balancing the need for housing with the continuation of public services and urban design priorities. While the potential for land assembly and increased housing capacity exists, the current allocation reflects a realistic and achievable approach within the current planning context, ensuring the site's development aligns with both local needs and regional planning objectives. | Yes | 01708 | Better Homes Enfield |
| **SA1.4: Enfield Civic Centre** | The Enfield Society has raised several concerns about the proposed mixed-use Civic hub, including 114 new dwellings and tall buildings up to 39m high. Firstly, the inclusion of the Civic Centre on the Local Heritage List is factually incorrect, as it was proposed but not agreed upon by the Review Panel. The site is, however, within the immediate setting of numerous listed buildings on Silver Street, which could be substantially harmed by the development. The water gardens, which soften the bulk of the existing tower and contribute to the setting of nearby heritage assets, are at risk of being replaced with a more massive structure closer to the street, as suggested by the VuCities modelling. Design Principle H states that buildings must be set back from the street, but the degree of set-back is unclear. Additionally, the policy's specified height of 39m contradicts Box 2.1's requirement | The Enfield Local Plan recognizes the importance of safeguarding heritage assets. The development principles in Design Principles H and I seek to balance the need for growth with the protection of these sensitive areas. The use of the term "consider" in the context of long views and the siting of tall buildings emphasizes a careful, case-by-case approach that allows for flexibility while ensuring heritage impacts are thoroughly assessed. The Site Allocation Topic Paper provides further clarification by outlining the detailed assessments undertaken to ensure that developments are aligned with both local and national heritage conservation standards. As part of the development process, full heritage impact assessments will be required, particularly for sites near designated heritage assets, to mitigate any adverse effects. The Council is committed to refining these principles as the | No | 01794 | Enfield Society |

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| | that new buildings must be perceptively lower than the existing tower. There is also uncertainty about the number of towers proposed, with concept plans suggesting three towers while VuCities modelling shows two. This difference is significant and should be clarified before enshrining the development principle in the Local Plan. Furthermore, the amenity of residents on St. Andrews Road may be adversely affected by the introduction of a new tall building. Design Principle I requires consideration and minimization of impacts on long views from the Enfield Town Conservation Area, but once the principle of development is approved, minimizing these impacts may be difficult. Therefore, greater certainty and detailed modifications to the concept plan are necessary. | Local Plan progresses to ensure robust protection of Enfield's heritage while facilitating sustainable development. | | | |
| **SA1.5: St Anne's Catholic High School for Girls** | TfL welcomes the requirement for a car-free development but suggests changing the wording to "must be a car-free development" to ensure consistency with the London Plan, given the PTAL of up to 5. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA1.5: St Anne's Catholic High School for Girls** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA1.5: St Anne's Catholic High School for Girls as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA1.2 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA1.5, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **SA1.5: St Anne's Catholic High School for Girls** | Sport England argues that the allocation SA1.4 does not appear to impact on the existing playing field, however it does impact on the existing MUGA, therefore this site allocation does not meet with the NPPF paragraph 103 as well as Sport England's playing field guidance. If there are indoor sport facilities at the school, then these should be replaced to ensure there is no loss of sport provision in the area and displacement of clubs. The sport facilities must be replaced to, at least, the same quality, quantity and accessibility as the existing site as outlined in the local plan. This should be made clear in the allocation. Sport England are also concerned that the existing playing field will not be managed or maintained if the existing schools is to be replaced. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SA1.5: St Anne's Catholic High School for Girls** | Better Homes Enfield critiques the site allocation SA1.5 for St Anne's Catholic High School for Girls in the Enfield Local Plan (ELP), arguing that it may not be legally compliant with the London Plan 2021. The group highlights that the site's current allocation does not optimize its potential for housing delivery, particularly after the site size was reduced from 1.76 hectares to 0.85 hectares due to the exclusion of the playing field, resulting in a significant reduction in the number of homes from 236 to 133. The group argues that this reduction is problematic given the site's location in a highly sustainable area near a railway station, which should support a higher density of development. The group also points out that the exclusion of the playing field was based on ownership uncertainties, which should be resolved within the plan-making process to fully optimize the site's potential. To address these issues, the group recommends that the site allocation for St Anne's Catholic High School for Girls be modified to consider the playing field area in the planning process, ensuring that the site can deliver a higher number of homes or provide other community benefits, such as accessible green space. This modification would align the site allocation with London Plan Policies D3 and H1, which require the optimization of brownfield sites, especially those near transport hubs. Additionally, it would ensure that the site allocation meets the soundness criteria set out in the National Planning Policy Framework (NPPF), which emphasizes the | Comments noted. The allocation of 0.85 hectares for the St Anne's Catholic High School for Girls site in the ELP reflects a strategic decision based on the current ownership and planning context. The reduction in site size from 1.76 hectares to 0.85 hectares, which led to a decrease in the projected number of homes, was driven by the uncertainty surrounding the ownership of the playing field. This cautious approach ensures that the ELP remains realistic and deliverable, focusing on land that is currently available and feasible for development. The decision to exclude the playing field from the current allocation does not preclude its future development; rather, it allows for the potential to revisit and incorporate the playing field area in the plan once ownership issues are resolved. This phased and flexible approach ensures that the ELP remains aligned with both the London Plan and the National Planning Policy Framework (NPPF), balancing the need for housing delivery with practical considerations of land availability. Furthermore, the Site Allocation Topic Paper emphasizes the importance of flexibility in site allocations, allowing for adjustments as new information and opportunities arise. The current allocation ensures that the site can be developed in a manner that is consistent with the surrounding urban fabric and infrastructure capacity, while also leaving open the possibility for future enhancements. Should the ownership of the playing field be clarified, the ELP provides the flexibility to reconsider the site's capacity | Yes | 01708 | Better Homes Enfield |

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| | effective use of land to meet housing needs, particularly in constrained areas like Enfield. | and optimize its potential in line with London Plan Policies D3 and H1, which advocate for maximizing the use of brownfield sites. This approach allows the ELP to be both responsive and resilient, ensuring that it meets local and regional housing needs while adhering to the principles of sound planning. In summary, the current allocation for St Anne's Catholic High School for Girls in the ELP is a measured and strategic response to existing constraints, with provisions in place to revisit and optimize the site's potential as conditions evolve. This approach aligns with the strategic goals of the London Plan and the NPPF, ensuring that the site can contribute effectively to Enfield's housing needs in a sustainable and achievable manner. | | | |
| **SA1.6: 100 Church Street** | TfL notes the requirement for limited residential parking but suggests it should be amended to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA1.6: 100 Church Street** | The Enfield Society raises concerns about a footnote to the policy that states the estimated capacity is based on an extant planning consent (20/02858/FUL). Despite this consent, the site has been included as a site allocation to safeguard against potential future changes since work has not yet commenced. Their primary concern is that the Visual Impact Assessment for the application did not include the view from the Jephcott Bridge over the New River, one of the borough's most important local views. They argue that the proposed building, while similar in height to the existing structure, is bulkier and more massive, and will appear prominently and negatively in views from the bridge. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SA1.7: Oak House, 43 Baker Street** | TfL notes the requirement for limited parking but suggests it should be amended to state that parking must be minimized for all proposed uses, including residential and commercial, to ensure consistency with the London Plan. TfL supports streetscape improvements but emphasizes that any proposals affecting the A10 or its frontage should be agreed with TfL. They welcome improvements addressing severance issues and recommend no direct vehicle access (for parking or servicing) from the A10. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA2.1: Colosseum Retail Park** | The NHS London Healthy Urban Development Unit notes that the site has an existing permission which includes a financial contribution in phase 1 and the production of a Health Delivery Plan at the reserved matters stage to determine if a healthcare facility is needed. They recommend ongoing negotiations with the Integrated Care Board (ICB) to ensure appropriate phasing and delivery of healthcare services. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SA2.1: Colosseum Retail Park** | TfL welcomes the requirement for developments to contribute towards improvements at Southbury station. They note the requirement for limited parking but suggest it be amended to state that parking must be minimized for all proposed uses, including residential, commercial, and the re-provision of the retail store, to ensure consistency with the London Plan. TfL supports streetscape improvements but emphasises that any proposals affecting the A10 or its frontage should be agreed with TfL, with no direct vehicle access (for parking or servicing) from the A10. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| **SA2.1: Colosseum Retail Park** | The Environment Agency notes that development on historic landfills, such as Site SA2.1 (Colosseum Retail Park), may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **SA2.1: Colosseum Retail Park** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.1: Colosseum Retail Park** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.1: Colosseum Retail Park** | The Proposed Submission Local Plan for Enfield includes policies that may hinder new employment development, particularly in the Brimsdown Strategic Industrial Location. Additionally, the redevelopment of the Colosseum Retail Park in the Southbury Strategic Development Area requires a flexible approach to ensure viability and meet various borough needs over the plan period. Therefore, allocation SA2.1 should be amended to allow B2/B8 development within the site's development mix. This should be addressed through a Masterplanning approach to achieve placemaking objectives and protect residential amenity, given that the current development principles in the draft Local Plan have proven unviable. | The Council appreciates Blackrock UK Property Fund's input regarding the Proposed Submission Local Plan. The Council's approach, particularly concerning the Brimsdown Strategic Industrial Location and the Colosseum Retail Park redevelopment, is justified and grounded in extensive research and evidence. According to the Enfield Employment Topic Paper 2024, the proposed policies are designed to address current and future employment needs while ensuring sustainable development and placemaking objectives. The Employment Topic Paper provides a comprehensive analysis of employment land requirements and the strategic need to intensify and diversify employment sites to support economic growth. The Council remains committed to a flexible and pragmatic approach and welcomes continued dialogue to ensure the Local Plan aligns with both economic viability and the broader needs of the borough and look forward to working collaboratively through a Statement of Common Ground to refine these policies further. | No | 01952 | Blackrock UK Property Fund |
| **SA2.1: Colosseum Retail Park** | Better Homes Enfield critiques the site allocation SA2.1 for Colosseum Retail Park in the Enfield Local Plan (ELP), arguing that it is not legally compliant with the London Plan 2021. The group points out that London Plan Policy D3 requires developments to optimize site capacity through a design-led approach, particularly on brownfield sites within 800 meters of a station. The current allocation of 1,587 homes for Colosseum Retail Park is questioned because the approved application for the site allows for up to 1,800 homes, a figure used in all technical assessments except for viability testing. The critique argues that by using the lower figure, the ELP fails to optimize the site's capacity, which does not align with the London Plan's policies on increasing housing supply (Policy H1) and optimizing site capacity (Policy D3). To address these issues, the group recommends that the ELP modify the site allocation for Colosseum Retail Park to reflect the full potential of the site, aligning it with the extant planning approval of up to 1,800 homes. This change would ensure that the site allocation is legally compliant with the London Plan and meets the National Planning Policy Framework's (NPPF) requirements for effective land use and optimizing site densities. By doing so, the ELP would better support the strategic goal of maximizing housing delivery on suitable brownfield sites in sustainable locations. | Comments noted. The allocation of 1,587 homes for the Colosseum Retail Park site is informed in a strategic and design-led approach that balances the need for housing delivery with the site's specific context, as outlined in the Site Allocation Topic Paper. While the planning approval for the site allows for up to 1,800 homes, the figure of 1,587 homes was chosen to reflect a cautious approach that ensures the development is sustainable and aligns with local infrastructure capacities, urban design principles, and community impact considerations. This approach is consistent with the London Plan's emphasis on optimizing site capacity while ensuring that developments are of an appropriate scale and form for their context, as required by Policy D3. Furthermore, the ELP recognizes the importance of flexibility in site allocations, allowing for adjustments as part of the planning application process. While the ELP's allocation provides a baseline figure, the final number of homes delivered on the site could indeed reflect the higher capacity, subject to further detailed assessments at the planning application stage. This approach ensures that the development remains responsive to both local needs and broader strategic objectives, without precluding the possibility of optimizing housing delivery in line with the site's full potential. The Site Allocation Topic Paper underscores the importance of this flexibility, noting that site allocations are intended to guide development while allowing for variations based on detailed planning and design considerations. In summary, the allocation of 1,587 homes at Colosseum Retail Park within the ELP reflects a balanced and flexible approach that aligns with both the London Plan and the National Planning Policy Framework | Yes | 01708 | Better Homes Enfield |

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| | | (NPPF). This approach ensures that the site is developed in a manner that is sustainable, contextually appropriate, and capable of adapting to the full potential of the site as determined through the planning process. | | | |
| **SA2.3: Morrisons, Southbury Road** | TfL supports in principle replacing the footbridge over Southbury Road with a pedestrian crossing. They welcome the requirement for developments to contribute towards improvements at Southbury station. TfL notes the requirement for limited parking but suggests it should be amended to state that parking must be minimized for all proposed uses, including residential, commercial, and re-provision of leisure uses, to ensure consistency with the London Plan. TfL also supports streetscape improvements but emphasizes that any proposals affecting the A10 or its frontage should be agreed with TfL, with no direct vehicle access (for parking or servicing) from the A10. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA2.3: Morrisons, Southbury Road** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.3: Morrisons, Southbury Road** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.3: Morrisons, Southbury Road** | Better Homes Enfield critiques the site allocation SA2.3 for Morrisons Southbury Road in the Enfield Local Plan (ELP), arguing that it is not legally compliant with the London Plan 2021. The group emphasizes that the current allocation of 646 units is significantly lower than what was proposed at the Regulation 18 stage (892 units) and far below the 1,050 to 1,250 units identified as achievable in a feasibility study submitted by Lichfields. The reduction in housing capacity is said to contradict London Plan Policies D3 and H1, which require optimizing site capacity through a design-led approach and maximizing housing delivery on brownfield sites, especially those within 800 meters of a station. The document questions the basis for this reduction, noting that the Council's rationale—based on the Character of Growth Study—lacks transparency and completeness, particularly given model errors cited in the report. To address these issues, the group recommends increasing the housing capacity for the Morrisons Southbury Road site to align with the feasibility study's findings and the site's potential. This adjustment would ensure that the site allocation is in conformity with the London Plan and consistent with the National Planning Policy Framework (NPPF), which emphasizes the need to make effective use of brownfield land and optimize site densities. By increasing the housing allocation, the site would better meet local and regional housing needs and adhere to both the legal requirements of the London Plan and the soundness criteria outlined in the NPPF. | Comments noted. The allocation of 646 units for the Morrisons Southbury Road site reflects a comprehensive and design-led approach that balances the need for housing delivery with the unique characteristics and constraints of the site. The Site Allocation Topic Paper emphasizes that the revised capacity figure was determined after further testing and detailed evidence gathering, including inputs from the Character of Growth Study. This study considered the site's context, including heritage impacts, infrastructure capacity, and urban design principles, to ensure that the development would be sustainable and appropriate for its surroundings. The revision from the initial 892 units proposed at Regulation 18 to 646 units was made to reflect these findings, ensuring that the site allocation aligns with the principles of good design and sustainable development. Moreover, the decision to set the capacity at 646 units was not made in isolation but rather as part of a broader strategy to ensure that all site allocations in the ELP are realistic, achievable, and reflective of local conditions. The ELP's approach to optimizing site capacity is consistent with London Plan Policy D3, which advocates for a design-led approach that considers the most appropriate form and land use for each site. Additionally, the allocation aligns with the National Planning Policy Framework (NPPF) by promoting effective use of land while ensuring that development is sensitive to the site's context. The flexibility embedded in the ELP allows for potential future revisions should new evidence or opportunities arise, ensuring that the site continues to contribute effectively to Enfield's housing needs while maintaining compliance with both the London Plan and the NPPF. In summary, the allocation for Morrisons Southbury Road in the ELP is a result of careful consideration and evidence-based decision-making. The revised capacity of 646 units is designed to be both sustainable and appropriate for the site, aligning with the strategic goals of the London Plan and the soundness criteria of the NPPF. | Yes | 01708 | Better Homes Enfield |
| **SA2.4: Southbury** | TfL welcomes the requirement for developments to contribute towards improvements at Southbury station. They note the requirement for limited parking | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan | No | 01891 | Transport for London |

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| **Leisure Centre** | but suggest it should be amended to state that parking must be minimized for all proposed uses, including residential, commercial, and the re-provision of the retail store, to ensure consistency with the London Plan. | policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SA2.4: Southbury Leisure Centre** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.4: Southbury Leisure Centre** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.4: Southbury Leisure Centre** | Turley on behalf of Royal London supports the Draft Site Allocation for Southbury Leisure Park but highlights several areas needing adjustment to ensure the redevelopment's success. They point out boundary inconsistencies, level differences, and unrealistic intensification targets. Royal London suggests a flexible approach to building heights and land uses, advocating for a design-led methodology that considers volumetric capacity and operational yard space. They propose refining the masterplan to reflect site-specific conditions and emphasize the need for a realistic, ambitious, and deliverable framework to optimize housing capacity and public benefits. | Noted. The Council will enter into a Statement of Common Ground with Royal London to address these concerns and ensure alignment with strategic goals and policies. | No | 01749 | Royal London Mutual Insurance Society Limited for Southbury Leisure Park |
| **SA2.4: Southbury Leisure Centre** | Turley on behalf of Royal London specifically regarding Site Allocation SA2.4 and tall buildings policy, emphasizes several key points. The Draft Local Plan and Policy DE6 define tall buildings as those 21 meters or above. Turley supports the general principles for the redevelopment of Southbury Leisure Park but finds the proposed building heights and design principles too prescriptive. They argue for a more flexible, design-led approach that considers volumetric capacity and operational yard space rather than fixed height limits. Turley highlights inconsistencies in the evidence base, particularly concerning height limitations and the need for a detailed, site-specific analysis rather than broad-brush studies. They recommend removing specific height restrictions to allow for optimized, context-sensitive development, ensuring that the redevelopment can meet housing and employment needs effectively. | Comments noted. The London Borough of Enfield acknowledges the importance of flexibility in site allocations and the need for a design-led approach to tall buildings. The Characterisation Study and Character of Growth Report are key evidence bases that guide planning decisions. These reports identify areas suitable for transformation, emphasizing context-sensitive design and optimizing site capacities. The Council is prepared to work with stakeholders, such as Turley, to refine site allocations and policies. A Statement of Common Ground will be prepared to address specific concerns and explore viable solutions collaboratively. | No | 01749 | Royal London Mutual Insurance Society Limited for Southbury Leisure Park |
| **SA2.4: Southbury Leisure Centre** | Anstey Horne provided daylight and sunlight analysis for Southbury Leisure Park's redevelopment under Draft Site Allocation SA2.4. They used the BRE Guidelines to create a 3D model for detailed assessments. Identified receptors include two-storey houses to the south and west, the Colosseum Retail Park to the east, and Kingsmead School. The BRE Guidelines recommend flexibility for redevelopment sites, considering both the change and quality of retained light. Initial findings suggest that proposed taller buildings can be supported without significant amenity effects, emphasizing a design-led approach for final height determination. | Noted. The Council will enter into a Statement of Common Ground with Royal London to address these concerns and ensure alignment with strategic goals and policies. | No | 01749 | Royal London Mutual Insurance Society Limited for Southbury Leisure Park |
| **SA2.4: Southbury Leisure Centre** | The Social Infrastructure Assessment (SIA) for Southbury Leisure Park (SLP), provided in support of Royal London's respresentation, supports developing 1,000 homes, analyzing the need for early years education, primary and secondary education, healthcare, and community facilities. It concludes that existing local services can meet the increased demand. However, on-site provision for 342 sqm of early years (185 sqm), library (63 sqm), and arts & culture space (94 sqm) is recommended. This on-site provision is considered manageable, realistic, and | Noted. The Council will enter into a Statement of Common Ground with Royal London to address these concerns and ensure alignment with strategic goals and policies. | No | 01749 | Royal London Mutual Insurance Society Limited for Southbury Leisure Park |

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| | beneficial for both new residents and the wider community, aligning with Enfield's planning policies. | | | | |
| **SA2.4: Southbury Leisure Centre** | Turley, on behalf of Royal London Mutual Insurance Society Limited, submits written representations to the London Borough of Enfield regarding the Draft Local Plan (Regulation 19, March 2024). They emphasize Royal London's long-term interest in Southbury Leisure Park, advocating for a flexible, ambitious, and deliverable planning framework to support sustainable growth. While supporting the general direction and principle of Site Allocation 2.4, they raise concerns about building heights and housing capacity. The submission includes a masterplan and design principles, supported by technical assessments and documents such as heritage, daylight, transport, and social infrastructure notes. | Noted. The Council will enter into a Statement of Common Ground with Royal London to address these concerns and ensure alignment with strategic goals and policies. | No | 01749 | Royal London Mutual Insurance Society Limited for Southbury Leisure Park |
| **SA2.4: Southbury Leisure Centre** | Turley's, on behalf of Royal London Mutual Insurance Society Limited, review of Southbury Leisure Park highlights its current use and accessibility, noting good public transport links set to improve further. The site's redevelopment potential is underlined by its PTAL rating of 3, expected to rise to 4 by 2031. The draft allocation suggests 605 residential units, but Turley advocates for up to 1,000 units, citing reduced car dependency and significant improvements in active travel infrastructure. A comparison with the Colosseum Retail Park's approved development supports the feasibility of higher density, near car-free development, indicating a positive impact on local traffic conditions and enhanced connectivity. | Noted. The Council will enter into a Statement of Common Ground with Royal London to address these concerns and ensure alignment with strategic goals and policies. | No | 01749 | Royal London Mutual Insurance Society Limited for Southbury Leisure Park |
| **SA2.4: Southbury Leisure Centre** | Turley's, on behalf of Royal London Mutual Insurance Society Limited critiques the height restrictions for tall buildings in Enfield’s Draft Local Plan, specifically for the Southbury Leisure Park site (SA2.4). It argues that the height limitations are based on broad studies rather than detailed site analysis, limiting the potential for higher-density development in an area with minimal heritage constraints. The consultants recommend a design-led approach to determine appropriate building heights, allowing for more flexibility and ensuring the plan supports the borough's housing and employment targets while aligning with national and regional policies. | Comments noted. The London Borough of Enfield acknowledges the importance of flexibility in site allocations and the need for a design-led approach to tall buildings. The Characterisation Study and Character of Growth Report are key evidence bases that guide planning decisions. These reports identify areas suitable for transformation, emphasizing context-sensitive design and optimizing site capacities. The Council is prepared to work with stakeholders, such as Turley, to refine site allocations and policies. A Statement of Common Ground will be prepared to address specific concerns and explore viable solutions collaboratively. | No | 01749 | Royal London Mutual Insurance Society Limited for Southbury Leisure Park |
| **SA2.5: Tesco, Ponders End** | TfL welcomes the requirement for developments to contribute towards improvements at Southbury station. They note the requirement for limited parking but suggest it be amended to state that parking must be minimized for all proposed uses, including residential, commercial, and the re-provision of the retail store, to ensure consistency with the London Plan. TfL supports streetscape improvements but emphasizes that any proposals affecting the A10 or its frontage should be agreed with TfL, with no direct vehicle access (for parking or servicing) from the A10. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA2.5: Tesco, Ponders End** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water’s website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.5: Tesco, Ponders End** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.6: Sainsburys, Crown Road** | TfL welcomes the inclusion of advice regarding the continued operation of the bus station, but suggests the site allocation should clearly state that the bus station must be retained in any redevelopment. Additional space may be needed for | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of | No | 01891 | Transport for London |

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| | electric bus charging facilities and for Dial-a-Ride buses at the shopping centre. TfL also welcomes the requirement for developments to contribute to improvements at Edmonton Green station, bus facilities, and bus frequencies. Any proposals for increased bus frequencies should be discussed with TfL to ensure long-term viability, based on expected trip generation. Furthermore, TfL supports the requirement for car-free development, consistent with the London Plan and considering the PTAL of up to 6a. This requirement should apply to all proposed uses, including residential and retail. | Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SA2.6: Sainsburys, Crown Road** | The Environment Agency notes that development on historic landfills, such as Site SA2.6: Sainsburys, Crown Road, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **SA2.6: Sainsburys, Crown Road** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.6: Sainsburys, Crown Road** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA3.1: Edmonton Green Shopping Centre** | Historic England recommends strengthening the design principles for heritage-sensitive areas, clarifying GLAAS consultation requirements, and providing explanations of the colour coding in the heritage considerations boxes where applicable. For Policy SA3.1, under the design principles, they suggest amending bullet point J to read: "Development must carefully assess its impact, particularly in relation to the placement of taller buildings, and demonstrate how it has responded to the historic character of surrounding conservation areas, with due regard to the Character of Growth study and relevant guidance within conservation area appraisals and management plans." | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SA3.1: Edmonton Green Shopping Centre** | The NHS London Healthy Urban Development Unit supports the redevelopment of the shopping center, noting that the existing permission includes a Section 106 agreement for a primary healthcare contribution in phase 1 and a Health Delivery Plan for subsequent phases. This acknowledges that the Evergreen Health Centre is at peak capacity and plans for its reconfiguration are in place. Given the significant development expected later in the plan period, ongoing negotiations with the Integrated Care Board (ICB) are recommended to ensure sufficient healthcare provision. Any future applications should secure a similar agreement for health provision. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SA3.1: Edmonton Green Shopping Centre** | TfL welcomes the requirement for developments to contribute towards improvements at Edmonton Green station and bus facilities, but questions the mention of bus frequency given the PTAL of 5 and the proposed residential use. While the development is stated to provide limited residential parking, TfL asserts that due to the PTAL of 5, the site must be a car-free development to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA3.1: Edmonton** | Based on available data, the Environment Agency identifies that several sites, including Site SA3.1, are either partly or wholly within Flood Zones 2 or 3. The EA | The council welcomes the feedback and for highlighting the flood risk data for Site SA3.1. The Council will review the classification of the site, considering the | Yes | 01926 | Environment Agency |

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| **Green Shopping Centre** | recommends that Site SA3.1 specifically be classified within Flood Zone 2 due to its flood risk. | available data and the Environment Agency's recommendation to designate it within Flood Zone 2. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | | | |
| **SA3.1: Edmonton Green Shopping Centre** | Sport England objects to the application as it appears to advocate the loss of the leisure centre without it being replaced. As result, this would not meet NPPF, paragraph 103. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SA3.1: Edmonton Green Shopping Centre** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA3.1: Edmonton Green Shopping Centre** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA3.1: Edmonton Green Shopping Centre** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA3.1: Edmonton Green Shopping Centre** | The Councillor objects to the redevelopment of Edmonton Green Shopping Centre as set out in SA3.1. He highlights concerns about adding 1,423 homes through tall buildings up to 69 meters high, which could exacerbate existing high density and strain local amenities, infrastructure, and transport. There are worries about the impact on schools, utilities, parking, local businesses, and heritage sites. The plan lacks specifics on how increased infrastructure needs will be met. The objection suggests prioritizing the replacement of existing tower blocks before adding new ones and ensuring the retention of the leisure center and library. | Comments noted. The comprehensive redevelopment of Edmonton Green Shopping Centre aligns with Enfield's Local Plan and addresses urban density while enhancing local amenities. The Site Allocation Topic Paper emphasizes a balanced approach to development, integrating main town centre uses with residential units, promoting sustainable urban growth. Concerns about increased density and tall buildings are addressed through a design strategy emphasizing high-quality architecture, mixed-use spaces, and improved public realms. This aligns with Enfield's Design and Character Evidence Base, which advocates for creating vibrant, sustainable communities. Proposed building heights optimize land use and contribute to the local skyline, balancing new development with the existing urban fabric. The redevelopment plan includes provisions for enhancing local infrastructure, including transport, utilities, and public services. The Site Allocation Topic Paper details the intention to work closely with stakeholders to ensure that housing growth is supported by necessary improvements in local services, such as healthcare, education, and public transport. The emphasis on a transport hub at Edmonton Green aims to enhance connectivity and reduce congestion. Additionally, Enfield's Infrastructure Delivery Plan ensures coordinated development and infrastructure improvements. Reducing parking spaces promotes sustainable transport options and reduces reliance on cars, aligning with NPPF objectives. The redevelopment plan includes measures to support local | No | 01779 | Cllr Fallart |

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| | | businesses and maintain the commercial viability of the shopping centre. The strategic location of Edmonton Green as a transport hub will support the shift towards sustainable travel modes. The plan considers the impact on heritage assets and conservation areas, ensuring that new developments respect and enhance the area's historic character. Retaining community assets like the leisure centre and library is prioritized to maintain the social fabric and recreational opportunities for residents. The proposed redevelopment of Edmonton Green Shopping Centre meets the NPPF soundness test by addressing urban density challenges, enhancing local infrastructure, and ensuring sustainable development. The plan incorporates robust design principles and stakeholder engagement to create a vibrant, well-connected, and resilient urban environment. For detailed information, refer to the Site Allocation Topic Paper, Enfield's Design and Character Evidence, and Enfield's Infrastructure Delivery Plan. | | | |
| **SA3.1: Edmonton Green Shopping Centre** | The Councillor, on behalf of the Edmonton and Winchmore Hill Conservative Association, objects to the proposed redevelopment of Edmonton Green Shopping Centre as outlined in SA3.1. Concerns are raised about the addition of 1,423 homes through tall buildings up to 69 meters high, which they believe would exacerbate existing high-density issues and put further strain on local infrastructure, amenities, and transport. The Association expresses particular concern over the impact on schools, utilities, parking, local businesses, and nearby heritage sites, noting that the plan lacks clear details on how the increased demand for infrastructure will be addressed. They recommend prioritizing the replacement of existing tower blocks before introducing new ones and stress the importance of retaining key community assets such as the leisure center and library. The Association calls for amendments to SA3.1, including reducing the height and density of the proposed development, and explicitly ensuring that the library and leisure center remain part of the redevelopment plan. | Comments noted. The comprehensive redevelopment of Edmonton Green Shopping Centre aligns with Enfield's Local Plan and addresses urban density while enhancing local amenities. The Site Allocation Topic Paper emphasizes a balanced approach to development, integrating main town centre uses with residential units, promoting sustainable urban growth. Concerns about increased density and tall buildings are addressed through a design strategy emphasizing high-quality architecture, mixed-use spaces, and improved public realms. This aligns with Enfield's Design and Character Evidence Base, which advocates for creating vibrant, sustainable communities. Proposed building heights optimize land use and contribute to the local skyline, balancing new development with the existing urban fabric. The redevelopment plan includes provisions for enhancing local infrastructure, including transport, utilities, and public services. The Site Allocation Topic Paper details the intention to work closely with stakeholders to ensure that housing growth is supported by necessary improvements in local services, such as healthcare, education, and public transport. The emphasis on a transport hub at Edmonton Green aims to enhance connectivity and reduce congestion. Additionally, Enfield's Infrastructure Delivery Plan ensures coordinated development and infrastructure improvements. Reducing parking spaces promotes sustainable transport options and reduces reliance on cars, aligning with NPPF objectives. The redevelopment plan includes measures to support local businesses and maintain the commercial viability of the shopping centre. The strategic location of Edmonton Green as a transport hub will support the shift towards sustainable travel modes. The plan considers the impact on heritage assets and conservation areas, ensuring that new developments respect and enhance the area's historic character. Retaining community assets like the leisure centre and library is prioritized to maintain the social fabric and recreational opportunities for residents. The proposed redevelopment of Edmonton Green Shopping Centre meets the NPPF soundness test by addressing urban density challenges, enhancing local infrastructure, and ensuring sustainable development. The plan incorporates robust design principles and stakeholder engagement to create a vibrant, well-connected, and resilient urban environment. For detailed information, refer to the Site Allocation Topic Paper, Enfield's Design and Character Evidence, and Enfield's Infrastructure Delivery Plan. | No | 01784 | Edmonton and Winchmore Hill Conservative Association |
| **SA3.2: Chiswick Road Estate** | TfL notes that while the development is stated to provide limited residential parking, the site must be a car-free development due to the PTAL of up to 6a, to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA3.2: Chiswick Road Estate** | Based on available data, the Environment Agency identifies that several sites, including Site SA3.2, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA3.2 specifically be classified within Flood Zone 2 and Flood Zone 3. Appendix C (page 388 of the ELP) states this site is in FZ1, this is incorrect. | The council welcomes the feedback and for highlighting the flood risk data for Site SA3.2. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation to designate it within Flood Zone 2. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national | Yes | 01926 | Environment Agency |

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| | | guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | | | |
| **SA3.2: Chiswick Road Estate** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA3.2: Chiswick Road Estate** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA3.3(URB.24): Fore Street Estate** | TfL welcomes the requirement for the development to contribute towards bus re-routing, future upgrades to bus capacity, and access improvements at Silver Street station to create an accessible route to the platform. They also support the requirement for the development to minimize parking. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA4.1: Joyce Avenue and Snells Park Estate** | The NHS London Healthy Urban Development Unit notes significant development expected in the next 10 years, including the Joyce and Snells planning application and Upton Road and Raynham Road developments. A new health centre will be required for the growing population. It is unclear if this will be a shared Integrated Hub with Meridian Water or a separate health centre. Continued discussions with the NHS are necessary, and they request consultation on pre-application schemes.<br><br>They suggest revised wording for point 13 to clarify that, if a study identifies the need for a health and wellbeing centre, it should be financed by the developer. The proposed wording includes contributing to a study led by the Integrated Care Board and North Middlesex University Hospital Trust and, if needed, providing or financing the health and wellbeing centre.<br><br>Additionally, they highlight accessibility issues with North Middlesex Hospital and note that the Trust is in discussions with TfL regarding step-free access and other improvements. The Trust will submit a more detailed response on this matter. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SA4.1: Joyce Avenue and Snells Park Estate** | TfL welcomes the requirement for the development to contribute towards access improvements at Silver Street station to create an accessible route to the platform. They note that while the development is stated to provide limited residential parking, the site must be a car-free development due to the PTAL of 4-6, to ensure consistency with the London Plan. TfL supports streetscape improvements but emphasizes that any proposals affecting the North Circular Road or its frontage should be agreed with TfL, with no direct vehicle access (for parking or servicing) from the North Circular Road. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA4.1: Joyce Avenue and Snells Park Estate** | Sport England would like to see specific reference to sport and recreation facilities in this policy as there is an approximate delivery of housing capacity over 100. In order to meet with policy CL5, paragraph 9 the development should contribute to on-site sport, leisure and recreation facilities or provide off-site contributions. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |

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| **SA4.1: Joyce Avenue and Snells Park Estate** | Thames Water recommends that developers and the Local Planning Authority liaise with them early to agree on a housing phasing plan for developments in the catchment area. This is to ensure that water supply network infrastructure upgrades are completed before the occupation of new developments. Without early coordination, planning conditions may be imposed to control the phasing of development to prevent outpacing the delivery of essential upgrades. Developers can request information on network infrastructure through the Thames Water website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA4.1: Joyce Avenue and Snells Park Estate** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA4.1: Joyce Avenue and Snells Park Estate** | Thames Water notes that the development boundary is within a Source Protection Zone for groundwater abstraction, which could be at risk from polluting activities. To prevent pollution, a tiered, risk-based approach will be used by the Environment Agency and Thames Water to regulate activities impacting groundwater resources. The applicant is encouraged to review the Environment Agency's approach to groundwater protection and may consult with a qualified environmental consultant to understand the implications for their development. More information is available at Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA4.2: Upton Road and Raynham Road** | TfL welcomes the requirement for the development to contribute towards access, facilities, and interchange improvements at Silver Street station. They note the requirement for limited parking but suggest it should be amended to state that parking must be minimized to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA4.2: Upton Road and Raynham Road** | Based on available data, the Environment Agency identifies that several sites, including Site SA4.2, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA4.2 specifically be classified within Flood Zone 2 and Flood Zone 3. Appendix C (page 394) states this site is in FZ1, this is incorrect. | The council welcomes the feedback and for highlighting the flood risk data for Site SA4.2. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation to designate it within Flood Zone 2. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | Yes | 01926 | Environment Agency |
| **SA4.2: Upton Road and Raynham Road** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA4.2: Upton Road and Raynham Road** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | | | | |
| **SA4.2: Upton Road and Raynham Road** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA4.3: Langhedge Lane Industrial Estate** | TfL welcomes the requirement for the development to contribute towards access improvements at Silver Street station. They note the requirement for limited parking but suggest it be amended to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA4.3: Langhedge Lane Industrial Estate** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA4.3: Langhedge Lane Industrial Estate** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA4.4: South-east corner of North Middlesex University Hospital Trust** | TfL welcomes the requirement for the development to contribute towards access improvements at Silver Street station to create an accessible route to the platform. They note that the development is stated to provide limited parking, but emphasize that due to the PTAL of 5, the site must be a car-free development to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA4.4: South-east corner of North Middlesex University Hospital Trust** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA4.4: South-east corner of North Middlesex University Hospital Trust** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **SA4.4: South-east corner of North Middlesex University Hospital Trust** | Vistry Group supports the draft site allocation for the North Middlesex University Hospital site (SA4.4) but requests amendments for greater flexibility. They suggest increasing the housing capacity from 260 to 300 homes, updating the delivery timeframe, and ensuring the Planning Brief link is functional. They recommend reconciling contradictory design principles regarding the non-designated heritage asset and allowing for taller buildings up to 48m (16-storeys) instead of 39m (13-storeys). These changes would optimize housing delivery and align with their ongoing bid proposals. | The council appreciates Vistry Group's support and acknowledges the concerns regarding the wording of policy SA 4.4. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **SA4.5: Public House, 50-56 Fore Street, London** | TfL welcomes the requirement for the development to contribute towards improved bus access and enhanced services from Meridian Water to Edmonton Green and along the A1055 corridor. They suggest referring to additional bus stops using similar wording to SA5.2 (phase 2). Enhanced bus services must be economically viable based on expected trip generation, and TfL is updating options for bus services to Meridian Water phases 1 and 2 based on the latest costs. They also note the requirement for limited parking but recommend amending it to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA4.5: Public House, 50-56 Fore Street, London** | Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA4.5: Public House, 50-56 Fore Street, London** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA4.5: Public House, 50-56 Fore Street, London** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA4.5: Public House, 50-56 Fore Street, London** | Better Homes Enfield critiques the site allocation SA4.5 for 50-56 Fore Street in the Enfield Local Plan (ELP), arguing that it is not legally compliant with the London Plan 2021. The group points out that the site has been allocated for 58 homes in the ELP, despite having planning permission for 110 homes. This discrepancy suggests that the site's capacity has not been optimized, which goes against London Plan Policy D3, which mandates that all developments make the best use of land through a design-led approach. Additionally, the London Plan's Policy H1 emphasizes the need to increase housing supply by optimizing the potential of all suitable brownfield sites, particularly those within 800 meters of a station, which applies to this site. To address these issues, the group recommends modifying the site allocation for 50-56 Fore Street to reflect the full potential of the site as per the existing planning approval of 110 homes. This change would ensure that the site allocation is legally compliant with the London Plan and consistent with the National Planning Policy Framework (NPPF), particularly in promoting effective land use and optimizing site densities. By aligning the site allocation with the planning approval, the ELP would better support the strategic goal of | Comments noted. The allocation of 58 homes for the site at 50-56 Fore Street reflects a cautious and context-sensitive approach, as detailed in the Site Allocation Topic Paper for Regulation 19. This approach ensures that the development aligns with the broader strategic objectives of the ELP while taking into account site-specific factors such as urban design considerations, infrastructure capacity, and the impact on the surrounding area. While the site has planning permission for 110 homes, the allocation of 58 homes in the ELP is intended to provide flexibility within the planning framework, allowing for further detailed assessments and potential adjustments during the planning application process. This ensures that any development is sustainable, viable, and appropriate for the local context. Furthermore, the ELP's site allocations, including that of 50-56 Fore Street, are part of a broader strategy that prioritizes balanced and sustainable growth across the borough. The lower allocation figure does not preclude the possibility of achieving higher densities through subsequent planning applications, where detailed design and infrastructure assessments can be conducted. This flexible approach allows the ELP to remain responsive to both | Yes | 01708 | Better Homes Enfield |

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| | maximizing housing delivery on suitable brownfield sites, thereby meeting both local and regional housing needs. | current and future needs while ensuring that developments contribute positively to the character and sustainability of the area. The Site Allocation Topic Paper supports this strategy by emphasizing the importance of context-driven planning that aligns with both the London Plan and National Planning Policy Framework (NPPF) requirements. In summary, the allocation of 58 homes at 50-56 Fore Street within the ELP is a strategic decision that balances the need for housing delivery with the preservation of local character and infrastructure capacity. The flexibility in the allocation allows for potential adjustments at the planning application stage, ensuring that the site can be developed in a manner that is both sustainable and aligned with broader planning objectives. | | | |
| **SA5.1: Meridian Water Phase 1** | The NHS London Healthy Urban Development Unit notes that the site has an extant permission for a mixed-use development, with some parts already occupied. The outline planning application for phase 2 includes a requirement for a 'Healthcare Delivery Plan' to identify opportunities for onsite healthcare provision. This could involve either identifying a suitable unit for the Integrated Care Board (ICB) on commercial terms or providing a property in lieu of financial contributions.<br><br>They recommend ongoing discussions with the NHS regarding the funding and phasing of the health facility at each development phase. A healthcare delivery plan should be secured for the site, and any subsequent applications should include a similar agreement to provide a health facility. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SA5.1: Meridian Water Phase 1** | TfL welcomes the requirement for the development to contribute towards improved bus access, including additional bus stops and enhanced services along the A1055 corridor. They note that any enhanced bus services must be economically viable based on expected trip generation and are updating options for bus services to Meridian Water phases 1 and 2 based on the latest costs. They also note the requirement for limited residential parking but suggest amending it to state that parking must be minimised, including for commercial uses, to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA5.1: Meridian Water Phase 1** | Based on available data, the Environment Agency identifies that several sites, including Site SA5.1, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA5.1 specifically be classified within Flood Zone 2 and Flood Zone 3. | The council welcomes the feedback and for highlighting the flood risk data for Site SA5.1. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | Yes | 01926 | Environment Agency |
| **SA5.1: Meridian Water Phase 1** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA5.1: Meridian Water Phase 1 as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA5.1 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA5.1, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **SA5.1: Meridian Water Phase 1** | This allocation is delivering a significant number of homes which will increase demand on open space, sport and recreation provision in the area. As mentioned above, Sport England would like to see specific mention under 'infrastructure requirements' of playing fields and recreation facilities delivered on site or contributions made off-site. Decisions for on and off- site contributions should be | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |

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| | based on an up-to-date PPS and BFS which will provide key evidence to support the strategic need for sport facilities. | | | | |
| **SA5.1: Meridian Water Phase 1** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.1: Meridian Water Phase 1** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.1: Meridian Water Phase 1** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.1: Meridian Water Phase 1** | Vistry Group supports the draft site allocation for Meridian Water Phase 1 (SA 5.1) but requests amendments to reflect planning permissions and development potential. They propose including a row for non-residential floorspace in the table, updating Footnote 8 to reference extant planning permissions, and revising design principles to allow for buildings up to 100m in height. Additionally, they seek to align the draft site allocation with the Tall Building Maps in Appendix C, reflecting the approved heights and ongoing discussions with the Council. | The council appreciates Vistry Group's support and acknowledges the concerns regarding the wording of policy SA 5.1. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **SA5.1: Meridian Water Phase 1** | The Meridian Water team welcomes the inclusion of various Meridian Water sites, including those under Enfield Council ownership: Meridian Water Phase 1, Meridian Water Phase 2, Meridian 13, and Meridian East (Harbet Road). They are keen to maintain a positive and constructive dialogue with the Local Planning Authority (LPA) to refine the Site Allocations' requirements, ensuring the draft allocations are based on up-to-date evidence and thus justified. This includes addressing gaps and inconsistencies in the accompanying plans, which can be readily rectified. For Meridian East (Harbet Road), it should be acknowledged that capacity figures are minimum estimates to be refined through future masterplanning to optimize the brownfield capacity of these sites via a design-led approach in accordance with London Plan Policy D3. | The support and constructive comments are welcomed regarding the inclusion of various Meridian Water sites in the draft allocations, including those under Enfield Council ownership. The Council's approach to site allocations is based on a comprehensive and up-to-date evidence base as detailed in the Site Allocation Topic Paper. This evidence ensures that the draft allocations are justified and aligned with the strategic objectives outlined in the Local Plan. The brownfield-first policy prioritizes the optimal use of previously developed land, in accordance with London Plan Policy D3, ensuring that capacity figures reflect realistic minimum estimates subject to refinement through detailed masterplanning.<br><br>The Council acknowledges the importance of refining site requirements and addressing any gaps or inconsistencies in the accompanying plans. The Council is committed to working collaboratively with stakeholders like the Meridian Water team to ensure that the final allocations are robust, evidence-based, and supportive of the overarching goals for housing and employment growth. The Council will continue its positive dialogue and propose entering into a Statement of Common Ground to facilitate ongoing collaboration and ensure that the site allocations and related policies are effectively tailored to meet shared objectives. | No | 01945 | Meridian Water (LBE) |
| **SA5.1: Meridian Water Phase 1** | Better Homes critiques the Enfield Local Plan's (ELP) site allocation SA 5.1 for Meridian Water Phase 1, arguing that it is not legally compliant with the London Plan 2021. The group highlights that London Plan Policy D3 requires developments to optimize site capacity through a design-led approach, particularly on sites near transport hubs like Meridian Water, which is only 50 meters from a | Comments noted. The allocation of 978 homes for the Meridian Water Phase 1 site is informed by a strategic and design-led approach, as detailed in the Site Allocation Topic Paper. This allocation reflects the current planning permissions and the council's broader strategy to ensure sustainable development that aligns with the infrastructure and environmental capacities of the area. While the site has | Yes | 01708 | Better Homes Enfield |

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| | railway station. The current allocation of 978 homes is based on existing planning permissions but does not include additional parcels of land within the Phase 1 boundary that are ready for development. These parcels, which are currently in temporary use, could realistically accommodate an additional 400 homes, bringing the total to around 1,350 to 1,400 homes. The omission of these parcels means the site allocation does not fully optimize the potential of this brownfield site, thus failing to comply with London Plan Policies D3 and H1. To address these issues, the document recommends modifying the site allocation to include the additional parcels of land that are currently excluded from the housing count. By doing so, the housing capacity of the site could be increased to align with the site's potential, making it legally compliant with the London Plan and consistent with the National Planning Policy Framework (NPPF). This modification would ensure that the site allocation makes effective use of available land, particularly in such a sustainable and strategically important location, thereby meeting both local and regional housing needs. | additional parcels of land that are currently in temporary use and have the potential to accommodate further housing, the ELP has prioritized a phased approach to development. This approach allows for the incremental build-out of the site, ensuring that each phase is supported by the necessary infrastructure and that the development remains sustainable and beneficial to the community. Furthermore, the ELP's site allocations, including Meridian Water Phase 1, are designed to be flexible and responsive to evolving needs and conditions. The current allocation does not preclude future phases from incorporating the additional parcels of land as part of the ongoing development strategy. This phased and flexible approach ensures that the site can be optimized over time, in alignment with the London Plan's policies on increasing housing supply (Policy H1) and optimizing site capacity through a design-led approach (Policy D3). The council is committed to revisiting site capacities as part of the ongoing planning process, ensuring that developments remain consistent with both local and regional planning objectives. In summary, the allocation of 978 homes at Meridian Water Phase 1 within the ELP reflects a strategic, phased approach that aligns with the broader goals of sustainable development and infrastructure capacity. The site's potential can be further explored in future phases, allowing the ELP to remain flexible and responsive while ensuring compliance with the London Plan and the National Planning Policy Framework (NPPF). | | | |
| **SA5.2: Meridian Water Phase 2** | National Grid has reviewed the Enfield Local Plan and identified that several proposed development sites, including RUR.06 (Land at Picketts Lock), SA5.2 (Meridian Water Phase 2), and SA5.6 (Meridian East - Harbet Road), are crossed or in close proximity to NGET assets. They propose modifications to include site-specific criteria, such as a strategy for responding to NGET overhead transmission lines, ensuring the NGET Design Guide and Principles are applied during masterplanning to reduce the impact through good design. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with National Grid to clarify these points further and ensure mutual understanding and agreement on these matters. | Yes | 01658 | National Grid |
| **SA5.2: Meridian Water Phase 2** | The NHS London Healthy Urban Development Unit notes that the site has an extant permission for a mixed-use development, with some parts already occupied. The outline planning application for phase 2 includes a requirement for a 'Healthcare Delivery Plan' to identify opportunities for onsite healthcare provision. This could involve either identifying a suitable unit for the Integrated Care Board (ICB) on commercial terms or providing a property in lieu of financial contributions.<br><br>They recommend ongoing discussions with the NHS regarding the funding and phasing of the health facility at each development phase. A healthcare delivery plan should be secured for the site, and any subsequent applications should include a similar agreement to provide a health facility. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SA5.2: Meridian Water Phase 2** | TfL welcomes the requirement for public transport improvements but suggests specifying the improvements, such as bus service capacity to meet demand and the retention and enhancement of bus standing facilities. Enhanced bus services must be economically viable based on expected trip generation, and TfL is updating options for bus services to Meridian Water phases 1 and 2 based on the latest costs. Additionally, the Design Principles should include a requirement to minimise parking for residential and commercial uses to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA5.2: Meridian** | Based on available data, the Environment Agency identifies that several sites, including Site SA5.2, are either partly or wholly within Flood Zones 2 or 3. The EA | The council welcomes the feedback and for highlighting the flood risk data for Site SA5.2. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation. The Council is | Yes | 01926 | Environment Agency |

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| **Water Phase 2** | recomends that Site SA5.2 specifically be classified within Flood Zone 2 and Flood Zone 3. | committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | | | |
| **SA5.2: Meridian Water Phase 2** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA5.2: Meridian Water Phase 2 as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA5.2 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA5.2, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **SA5.2: Meridian Water Phase 2** | This allocation is delivering a significant number of homes which will increase demand on open space, sport and recreation provision in the area. As mentioned above, Sport England would like to see specific mention under 'infrastructure requirements' of playing fields and recreation facilities delivered on site or contributions made off-site. Decisions for on and off- site contributions should be based on an up-to-date PPS and BFS which will provide key evidence to support the strategic need for sport facilities. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SA5.2: Meridian Water Phase 2** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.2: Meridian Water Phase 2** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.2: Meridian Water Phase 2** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.2: Meridian Water Phase 2** | Vistry Group supports the draft site allocation for Meridian Water Phase 2 (SA 5.2) but requests amendments for accuracy. They suggest updating the residential capacity to 2,300 homes, reflecting the outline permission, and including a reference to student accommodation. They also note an inconsistency in the draft Tall Building Maps, requesting the identification of Area 11.08 on the plan to match the description. These changes would ensure the allocation aligns with the existing planning permissions and development potential. | The council appreciates Vistry Group's support and acknowledges the concerns regarding the wording of policy SA 5.2. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |

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| **SA5.2: Meridian Water Phase 2** | The Meridian Water team welcomes the inclusion of various Meridian Water sites, including those under Enfield Council ownership: Meridian Water Phase 1, Meridian Water Phase 2, Meridian 13, and Meridian East (Harbet Road). They are keen to maintain a positive and constructive dialogue with the Local Planning Authority (LPA) to refine the Site Allocations' requirements, ensuring the draft allocations are based on up-to-date evidence and thus justified. This includes addressing gaps and inconsistencies in the accompanying plans, which can be readily rectified. For Meridian East (Harbet Road), it should be acknowledged that capacity figures are minimum estimates to be refined through future masterplanning to optimize the brownfield capacity of these sites via a design-led approach in accordance with London Plan Policy D3. | The support and constructive comments are welcomed regarding the inclusion of various Meridian Water sites in the draft allocations, including those under Enfield Council ownership. The Council's approach to site allocations is based on a comprehensive and up-to-date evidence base as detailed in the Site Allocation Topic Paper. This evidence ensures that the draft allocations are justified and aligned with the strategic objectives outlined in the Local Plan. The brownfield-first policy prioritizes the optimal use of previously developed land, in accordance with London Plan Policy D3, ensuring that capacity figures reflect realistic minimum estimates subject to refinement through detailed masterplanning.<br><br>The Council acknowledges the importance of refining site requirements and addressing any gaps or inconsistencies in the accompanying plans. The Council is committed to working collaboratively with stakeholders like the Meridian Water team to ensure that the final allocations are robust, evidence-based, and supportive of the overarching goals for housing and employment growth. The Council will continue its positive dialogue and propose entering into a Statement of Common Ground to facilitate ongoing collaboration and ensure that the site allocations and related policies are effectively tailored to meet shared objectives. | No | 01945 | Meridian Water (LBE) |
| **SA5.2: Meridian Water Phase 2** | Better Homes Enfield critiques the site allocation SA5.2 for Meridian Water Phase 2 in the Enfield Local Plan (ELP), arguing that it is not legally compliant with the London Plan 2021. Specifically, it points out that the number of homes allocated (2,230) does not fully align with the planning permission granted for the site, which allows for up to 2,300 residential units, along with potential student accommodation or large-scale shared living spaces. The group highlights that this discrepancy indicates the site is not being optimized as required by London Plan Policies D3 (optimizing site capacity) and H1 (increasing housing supply). Additionally, the document notes that further analysis has identified opportunities to increase the number of homes on specific parcels within the site, such as increasing the Meridian Two development from 274 to 453 homes, which would enhance both the quality of the accommodation and the public realm. To address these issues, the group recommends modifying the site allocation for Meridian Water Phase 2 to better reflect the planning approval and the site's potential, including opportunities for student housing and shared living. This adjustment would ensure that the site allocation is in conformity with the London Plan and consistent with the National Planning Policy Framework (NPPF), which emphasizes the need to optimize land use, particularly on brownfield sites. By aligning the allocation with these guidelines, the site would better meet local and regional housing needs while ensuring the plan’s legal compliance and soundness. | Comments noted. The allocation of 2,230 homes for Meridian Water Phase 2 reflects a strategic, evidence-based approach that takes into account the complexities and challenges of large-scale urban regeneration projects. The Site Allocation Topic Paper emphasizes that the ELP’s housing allocations are designed to be both realistic and deliverable within the plan period, considering existing infrastructure, environmental constraints, and the need to phase development appropriately. The decision to allocate 2,230 homes, rather than the full 2,300 permitted under the planning application, allows for flexibility and careful management of the site’s development, ensuring that the quality of the public realm and the living conditions are not compromised. Additionally, while the group acknowledges that there may be potential to optimize certain parcels of land within the site, such as the increase in homes at Meridian Two, the ELP’s approach ensures that these optimizations are balanced with broader strategic objectives, including the timely delivery of housing and infrastructure. The allocation reflects a cautious yet pragmatic approach that aligns with the London Plan’s policies on optimizing site capacity (Policy D3) and increasing housing supply (Policy H1), while also considering the realities of site-specific development challenges. In summary, the allocation for Meridian Water Phase 2 in the ELP is both sound and legally compliant, as it reflects a carefully considered approach to large-scale urban development. The flexibility inherent in the ELP allows for future optimizations as opportunities arise, ensuring that the site contributes effectively to Enfield’s housing needs while maintaining the quality and sustainability of the development. The ELP’s strategic approach is consistent with the principles of the London Plan and the National Planning Policy Framework (NPPF), ensuring that the plan remains both deliverable and aligned with regional and national policy objectives. | Yes | 01708 | Better Homes Enfield |
| **SA5.3: Former IKEA store, Glover Drive** | TfL welcomes the requirement for the development to provide improved bus access and stops but seeks clarification on what is meant by "diversions." They emphasize that any enhanced bus services must be economically viable based on expected trip generation. Additionally, TfL suggests that the Design Principles should include a requirement to minimise parking for residential and commercial uses, including any re-provided retail store, to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA5.3: Former IKEA store, Glover Drive** | Based on available data, the Environment Agency identifies that several sites, including Site SA5.6, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA5.6 specifically be classified within Flood Zone 2 and Flood Zone 3. | The council welcomes the feedback and for highlighting the flood risk data for Site SA5.3. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site | Yes | 01926 | Environment Agency |

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| | | allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | | | |
| **SA5.3: Former IKEA store, Glover Drive** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA5.3: Former IKEA store, Glover Drive as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA5.3 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA5.3, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **SA5.3: Former IKEA store, Glover Drive** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.3: Former IKEA store, Glover Drive** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.3: Former IKEA store, Glover Drive** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.3: Former IKEA store, Glover Drive** | Better Homes Enfield critiques the site allocation SA5.3 for the Former IKEA site at Meridian Water in the Enfield Local Plan (ELP), arguing that it is not legally compliant with the London Plan 2021. The group highlights that the allocation of 1,500 homes is insufficient given the site's potential and its proximity to Meridian Water railway station, which makes it a prime location for higher-density development. The document references a masterplan put forward by Sheppard Robson, which proposed 2,830 homes for the site, and notes that planning officers had indicated support for this higher-density development, provided it met environmental and infrastructure requirements. The current allocation of 1,500 homes is based on outdated estimates and does not optimize the site's capacity as required by London Plan Policies D3 (optimizing site capacity) and H1 (increasing housing supply). Consequently, the document argues that the site allocation does not conform to the London Plan and may not meet the soundness criteria set out in the National Planning Policy Framework (NPPF). To address these issues, the group recommends increasing the number of homes allocated to the site to better reflect its potential and align with the Council's broader vision for delivering 10,000 new homes across the Meridian Water area. This modification would ensure that the site allocation is in conformity with the London Plan and | Comments noted. The allocation of 1,500 homes for the Former IKEA site within the broader Meridian Water development reflects a carefully considered approach that balances housing delivery with the need to maintain flexibility in planning for the entire area. The Site Allocation Topic Paper emphasizes that the 1,500-home figure is part of a phased strategy that allows for incremental growth while ensuring that each phase of development is supported by the necessary infrastructure, environmental assessments, and community facilities. The approach takes into account the current planning context, existing infrastructure capacity, and the need for a design-led approach to optimize site potential over time. While higher densities, such as the 2,830 homes proposed in the Sheppard Robson masterplan, may be possible, the ELP's phased approach allows for ongoing assessment and adjustments to site capacity as development progresses. Furthermore, the ELP's allocation aligns with London Plan Policies D3 and H1 by adopting a design-led approach that ensures the most appropriate form of development for the site. The current allocation is designed to be realistic and deliverable within the plan period, while also leaving room for future revisions and optimizations as further infrastructure and environmental assessments are completed. This flexible approach ensures that the ELP remains adaptable to | Yes | 01708 | Better Homes Enfield |

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| | consistent with the NPPF's emphasis on making effective use of brownfield land. By optimizing the housing capacity for the Former IKEA site, the Enfield Local Plan would be better positioned to meet local and regional housing needs while adhering to national and regional planning policies. | evolving conditions and opportunities, thereby supporting the long-term vision of delivering 10,000 homes across the entire Meridian Water area. The phased development strategy outlined in the ELP ensures that housing delivery is balanced with the need for sustainable growth, infrastructure capacity, and community well-being. In summary, the allocation for the Former IKEA site within the ELP is a strategic and phased approach that aligns with both the London Plan and the National Planning Policy Framework (NPPF). While the potential for higher-density development exists, the current allocation is part of a broader, flexible strategy that ensures sustainable growth and the ability to adapt to future opportunities as the Meridian Water project progresses. | | | |
| **SA5.4: Tesco Extra, Glover Drive** | TfL suggests that the Design Principles should include a requirement to minimise parking for residential and commercial uses to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA5.4: Tesco Extra, Glover Drive** | Based on available data, the Environment Agency identifies that several sites, including Site SA5.4, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA5.4 specifically be classified within Flood Zone 2 and Flood Zone 3. | The council welcomes the feedback and for highlighting the flood risk data for Site SA5.3. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | Yes | 01926 | Environment Agency |
| **SA5.4: Tesco Extra, Glover Drive** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA5.4: Tesco Extra, Glover Drive as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA5.4 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA5.4, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **SA5.4: Tesco Extra, Glover Drive** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.4: Tesco Extra, Glover Drive** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.4: Tesco Extra, Glover Drive** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | | | | |
| **SA5.5: Meridian 13 (also known as Teardrop)** | TfL welcomes the requirement to ensure the reprovision of the existing Arriva bus garage in line with London Plan Policy T3, unless a suitable alternative has been provided elsewhere. They suggest amending the wording to "must ensure reprovision" due to the bus garage's importance in supporting the local bus network. The reprovision should consider transitioning to an all-electric bus fleet and the need for additional space for charging facilities, and this should be reinforced by including the re-provided bus garage in the Land Use Requirements. The Infrastructure Requirements should explicitly require contributions towards public transport, which could include bus service improvements and/or bus stops/stands to improve connectivity. Any enhanced bus services must be economically viable based on expected trip generation. TfL is updating options to provide bus services to Meridian Water phases 1 and 2 based on the latest costs. The Design Principles should state that the development must minimise parking for residential and commercial uses to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA5.5: Meridian 13 (also known as Teardrop)** | Based on available data, the Environment Agency identifies that several sites, including Site SA5.5, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA5.5 specifically be classified within Flood Zone 2 and Flood Zone 3. | The council welcomes the feedback and for highlighting the flood risk data for Site SA5.5. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | Yes | 01926 | Environment Agency |
| **SA5.5: Meridian 13 (also known as Teardrop)** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA5.5: Meridian 13 (also known as Teardrop) as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA5.5 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA5.5, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **SA5.5: Meridian 13 (also known as Teardrop)** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.5: Meridian 13 (also known as Teardrop)** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **SA5.5: Meridian 13 (also known as Teardrop)** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.5: Meridian 13 (also known as Teardrop)** | The Meridian Water team welcomes the inclusion of various Meridian Water sites, including those under Enfield Council ownership: Meridian Water Phase 1, Meridian Water Phase 2, Meridian 13, and Meridian East (Harbet Road). They are keen to maintain a positive and constructive dialogue with the Local Planning Authority (LPA) to refine the Site Allocations' requirements, ensuring the draft allocations are based on up-to-date evidence and thus justified. This includes addressing gaps and inconsistencies in the accompanying plans, which can be readily rectified. For Meridian East (Harbet Road), it should be acknowledged that capacity figures are minimum estimates to be refined through future masterplanning to optimize the brownfield capacity of these sites via a design-led approach in accordance with London Plan Policy D3. | The support and constructive comments are welcomed regarding the inclusion of various Meridian Water sites in the draft allocations, including those under Enfield Council ownership. The Council's approach to site allocations is based on a comprehensive and up-to-date evidence base as detailed in the Site Allocation Topic Paper. This evidence ensures that the draft allocations are justified and aligned with the strategic objectives outlined in the Local Plan. The brownfield-first policy prioritizes the optimal use of previously developed land, in accordance with London Plan Policy D3, ensuring that capacity figures reflect realistic minimum estimates subject to refinement through detailed masterplanning.<br><br>The Council acknowledges the importance of refining site requirements and addressing any gaps or inconsistencies in the accompanying plans. The Council is committed to working collaboratively with stakeholders like the Meridian Water team to ensure that the final allocations are robust, evidence-based, and supportive of the overarching goals for housing and employment growth. The Council will continue its positive dialogue and propose entering into a Statement of Common Ground to facilitate ongoing collaboration and ensure that the site allocations and related policies are effectively tailored to meet shared objectives. | No | 01945 | Meridian Water (LBE) |
| **SA5.5: Meridian 13 (also known as Teardrop)** | Better Homes Enfield critiques the site allocation SA5.5 for Meridian 13 in the Enfield Local Plan (ELP), arguing that it is not legally compliant with the London Plan 2021. The group highlights that the current allocation of 356 homes does not align with the London Plan's requirements for optimizing site capacity through a design-led approach, especially given the site's proximity to the Meridian Water railway station. The document notes that the Council's own feasibility studies and recent tender documents indicate the site could accommodate between 530 and 629 units, significantly more than the current allocation. This discrepancy suggests that the site is not being fully optimized, as required by London Plan Policies D3 (optimizing site capacity) and H1 (increasing housing supply), meaning the site allocation may not be in conformity with the London Plan. To address these issues, the group recommends modifying the site allocation for Meridian 13 to reflect its true potential, which could be between 530 and 629 homes. By increasing the number of homes allocated to the site, the allocation would better conform to the London Plan and align with the National Planning Policy Framework (NPPF) requirements for making effective use of brownfield land. This modification would ensure that the site allocation meets both the legal requirements and soundness criteria, thereby supporting Enfield's broader housing strategy and regional housing needs. | Comments noted. The allocation of 356 homes for Meridian 13 is the result of a careful, evidence-based approach that considers a range of factors, including existing infrastructure capacity, environmental constraints, and the need for phased development. The Site Allocation Topic Paper emphasizes that while the site has the potential for higher density, the current allocation is designed to be realistic and deliverable within the context of the broader Meridian Water masterplan. This phased approach allows for future adjustments to the site's capacity as further infrastructure improvements are made and as subsequent phases of development progress. The goal is to ensure that each phase of development is supported by the necessary infrastructure and services, thereby maintaining the sustainability and livability of the area. Additionally, the ELP's approach to site allocation reflects the principles of good design and sustainable development as outlined in London Plan Policies D3 and H1. The current allocation of 356 homes is based on detailed assessments that balance the need to optimize site capacity with the broader strategic goals for the Meridian Water area. The flexibility inherent in the ELP allows for future revisions and optimizations as opportunities arise, particularly as new infrastructure is developed and as further detailed planning takes place. This approach ensures that the site can evolve in a way that meets both local and regional housing needs while remaining consistent with the London Plan and the National Planning Policy Framework (NPPF). In summary, the allocation for Meridian 13 within the ELP is a strategic decision that reflects a balanced and phased approach to development. While the site has potential for higher density, the current allocation is designed to be achievable and sustainable within the broader context of the Meridian Water development. The ELP's flexibility ensures that future opportunities to optimize the site can be realized, aligning with both the London Plan and the NPPF's goals for sustainable and effective land use. | Yes | 01708 | Better Homes Enfield |
| **SA5.6: Meridian East (also known** | TfL welcomes the requirement for the development to contribute towards identified upgrades to the London Underground network serving Southgate. They note that making Southgate station step-free is not currently viable, so station improvements should focus on general access or capacity enhancements. TfL also notes the | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of | No | 01891 | Transport for London |

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| **as Harbet Road)** | requirement for limited parking but suggests it should be amended to state that parking must be minimised to ensure consistency with the London Plan. | Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **SA5.6: Meridian East (also known as Harbet Road)** | Based on available data, the Environment Agency identifies that several sites, including Site SA5.6, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA5.6 specifically be classified within Flood Zone 2 and Flood Zone 3. | The council welcomes the feedback and for highlighting the flood risk data for Site SA5.5. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | Yes | 01926 | Environment Agency |
| **SA5.6: Meridian East (also known as Harbet Road)** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA5.6: Meridian East (also known as Harbet Road) as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA5.6 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA5.6, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **SA5.6: Meridian East (also known as Harbet Road)** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.6: Meridian East (also known as Harbet Road)** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.6: Meridian East (also known as Harbet Road)** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.6: Meridian East (also known as Harbet Road)** | The Meridian Water team welcomes the inclusion of various Meridian Water sites, including those under Enfield Council ownership: Meridian Water Phase 1, Meridian Water Phase 2, Meridian 13, and Meridian East (Harbet Road). They are keen to maintain a positive and constructive dialogue with the Local Planning Authority (LPA) to refine the Site Allocations' requirements, ensuring the draft allocations are based on up-to-date evidence and thus justified. This includes addressing gaps and inconsistencies in the accompanying plans, which can be readily rectified. For Meridian East (Harbet Road), it should be acknowledged that capacity figures are minimum estimates to be refined through future | The support and constructive comments are welcomed regarding the inclusion of various Meridian Water sites in the draft allocations, including those under Enfield Council ownership. The Council's approach to site allocations is based on a comprehensive and up-to-date evidence base as detailed in the Site Allocation Topic Paper. This evidence ensures that the draft allocations are justified and aligned with the strategic objectives outlined in the Local Plan. The brownfield-first policy prioritizes the optimal use of previously developed land, in accordance with London Plan Policy D3, ensuring that capacity figures reflect realistic minimum estimates subject to refinement through detailed masterplanning. | No | 01945 | Meridian Water (LBE) |

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| | masterplanning to optimize the brownfield capacity of these sites via a design-led approach in accordance with London Plan Policy D3. | The Council acknowledges the importance of refining site requirements and addressing any gaps or inconsistencies in the accompanying plans. The Council is committed to working collaboratively with stakeholders like the Meridian Water team to ensure that the final allocations are robust, evidence-based, and supportive of the overarching goals for housing and employment growth. The Council will continue its positive dialogue and propose entering into a Statement of Common Ground to facilitate ongoing collaboration and ensure that the site allocations and related policies are effectively tailored to meet shared objectives. | | | |
| **SA5.6: Meridian East (also known as Harbet Road)** | Better Homes Enfield critiques the site allocation SA5.6 for Meridian East (Harbet Road) in the Enfield Local Plan (ELP), arguing that it is not legally compliant with the London Plan 2021. The group highlights that the allocation of 2,095 homes on this site does not align with the London Plan's requirements for optimizing site capacity through a design-led approach, especially for brownfield sites near transport hubs. The document points out a significant discrepancy between the Council's publicly stated vision of delivering 10,000 homes across the Meridian Water area and the total number of homes allocated in the ELP, which is only 7,990. This underutilization of the site, according to the document, fails to meet the London Plan's policies for increasing housing supply and optimizing land use. The group recommends modifying the site allocation to better reflect the actual potential of the site, which would bring the ELP into conformity with the London Plan. It suggests that the Council should clarify when and how its vision for 10,000 homes at Meridian Water will be achieved, including addressing the uncertainties surrounding the future use of industrial land within the site. By optimizing the housing capacity and providing clearer phasing and delivery plans, the site allocation could become sound and legally compliant, meeting both the requirements of the London Plan and the National Planning Policy Framework (NPPF). | Comments noted. The allocation of 2,095 homes for Meridian East (Harbet Road) reflects a strategic approach that balances the need for housing delivery with the requirements for maintaining industrial capacity and infrastructure in the area. The Site Allocation Topic Paper outlines the careful consideration given to the dual objectives of providing significant new housing while also ensuring that the site continues to support strategic industrial activities. The ELP's approach to phasing and development at Meridian Water is designed to be realistic and achievable within the constraints of the site, including the need to replace and enhance industrial capacity before large-scale residential development can proceed. The ELP recognizes the importance of optimizing land use, particularly in strategic locations like Meridian Water, which is near key transport infrastructure. However, the plan also acknowledges that the full potential of the site can only be realized through a phased approach that carefully manages the transition from industrial to residential uses. This phased approach is essential to maintaining the economic vitality of the area while also meeting the long-term housing targets set by the Council. The current allocation is part of a broader vision for Meridian Water that will be delivered over several phases, ensuring that both housing and employment needs are met in a sustainable and coordinated manner. In summary, the allocation for Meridian East (Harbet Road) within the ELP reflects a balanced approach to land use that aligns with both the London Plan and the National Planning Policy Framework (NPPF). The phased development strategy ensures that the site's full potential can be realized over time, supporting both housing delivery and industrial capacity in a way that is sustainable and legally compliant. The ELP's approach is designed to be flexible and responsive to future opportunities, allowing for the gradual realization of the Council's vision for 10,000 homes across the Meridian Water area while maintaining a strong economic base. | Yes | 01708 | Better Homes Enfield |
| **SA6.1: Southgate Office Village** | Historic England recommends strengthening the design principles for heritage-sensitive areas, clarifying GLAAS consultation requirements, and providing explanations of the colour coding in the heritage considerations boxes where applicable. For Policy SA6.1, under the design principles, they suggest adding at end of bullet point G: '…. Southgate Circus conservation area and respond appropriately to the guidance within the Character of Growth study'. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SA6.1: Southgate Office Village** | TfL welcomes the requirement for a car-free development. They recommend amending the wording to clarify that the existing car park should not be re-provided. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA6.1: Southgate Office Village** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA6.1: Southgate Office Village** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | | | | |
| **SA6.1: Southgate Office Village** | The site in question is close to the Southgate Conservation Area. Although the Planning Inspectorate granted permission for development (Appeal ref APP/Q5300/W/21/3270885), stating the taller elements would not usurp the conservation area's central focus, this conclusion may not apply to other tall building proposals nearby. The Society worries that future developments might negatively impact the setting and significance of the Charles Holden-designed station complex and the conservation area's overall character. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SA6.3: Michenden Car Park and Alan Pullinger Centre** | TfL welcomes the requirement for contributions towards identified upgrades to the London Underground network serving Arnos Grove, including funding for station access improvements such as lift installations for step-free access and streetscape enhancements for safety and accessibility. Regarding contributions for a rapid transit route, TfL reiterates that they have no funding or commitment for such a route. Instead, they suggest directing contributions towards supporting the recently introduced SL1 express bus service, including enhanced bus priority and improved infrastructure. TfL recommends changing the wording to reflect this. TfL also notes the requirement for limited parking but suggests it be amended to state that parking must be minimised to ensure consistency with the London Plan. They support streetscape improvements but emphasize that any proposals affecting the North Circular Road or its frontage should be agreed with TfL, with no direct vehicle access (for parking or servicing) from the North Circular Road. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA6.3: Michenden Car Park and Alan Pullinger Centre** | Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA6.3: Michenden Car Park and Alan Pullinger Centre** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA6.3: Michenden Car Park and Alan Pullinger Centre** | LBESPS supports the allocation of Minchenden Car Park and the Alan Pullinger Centre (SA6.3) for new homes, non-residential floorspace, and community use, subject to detailed design and amenity considerations. Proposals should consider the neighboring Premier Inn Hotel, Durants School, and Southgate Fire Station, particularly for access and traffic patterns. They support the estimated capacity of 33 new homes and recommend comprehensive engagement with existing community users. The site, being a sustainable and accessible brownfield location near Southgate Underground Station, should be prioritized for development within a 10-year timeframe. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |

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| **SA6.3: Michenden Car Park and Alan Pullinger Centre** | The Councillor for Southgate Ward argues that the Local Plan's proposal to consider housing on the Barnet and Southgate College (SA6.2) and Alan Pullinger Youth Centre (SA6.3) sites is inappropriate, emphasizing that these sites should remain dedicated to their current uses without being compromised by shared residential development. | Comments noted. Site selection process informed by a robust site selection methodology. | No | 01836 | Cllr Morreale |
| **SA7.1: Former Gasholder, New Southgate** | The NHS London Healthy Urban Development Unit notes that sites SA7.1, SA7.3, and SA7.4 are expected to deliver housing within the next five years. They welcome discussions as soon as possible to address how the healthcare requirements for the area will be accommodated following the anticipated population increase. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SA7.1: Former Gasholder, New Southgate** | TfL welcomes the requirement for contributions towards identified upgrades to the London Underground network serving Arnos Grove, including funding for station access improvements such as lift installations for step-free access and streetscape enhancements for safety and accessibility. They note the reference to contributions for a rapid transit route but reiterate that TfL has no funding or commitment for this. Instead, they suggest directing contributions towards supporting the SL1 express bus service with enhanced bus priority and improved infrastructure, recommending a wording change to reflect this. TfL also notes the requirement for limited parking but suggests amending it to state that parking must be minimised for residential and non-residential uses, including any re-provided retail uses, to ensure consistency with the London Plan. They support streetscape improvements but emphasise that any proposals affecting the North Circular Road or its frontage should be agreed with TfL, with no direct vehicle access (for parking or servicing) from the North Circular Road. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA7.1: Former Gasholder, New Southgate** | Based on available data, the Environment Agency identifies that several sites, including Site SA7.1, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA7.1 specifically be classified within Flood Zone 2 and Flood Zone 3. Appendix C (page 418) states this site is in FZ1, this is incorrect. The site is in FZ2 and FZ3 to the South and East. | The council welcomes the feedback and for highlighting the flood risk data for Site SA7.1. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | Yes | 01926 | Environment Agency |
| **SA7.1: Former Gasholder, New Southgate** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water’s website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA7.1: Former Gasholder, New Southgate** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA7.1: Former Gasholder,** | The Draft Local Plan Policy H1 allocates the Former Gasholder site (SA7.1) and the Aldi site (SA7.2) for residential development, emphasising brownfield site prioritisation. Builder Depot Group supports these allocations but suggests | The council appreciates The Builder Depot's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage | Yes | 01940 | Builder Depot Group |

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| **New Southgate** | updating the land use requirement to explicitly include employment and/or retail uses. Additionally, they question the need for references to funding TfL upgrades through Section 106 contributions, advocating instead for the use of Community Infrastructure Levy (CIL) funds. Therefore, they request the removal of these references in the allocations to align with Regulation 59(2) of the Community Infrastructure Levy Regulations (2010). Please consider these proposed amendments to ensure the policy accurately reflects sustainable development practices. | with The Builder Depot Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | | | |
| **SA7.2: Aldi, New Southgate (formerly Homebase)** | TfL welcomes the requirement for contributions towards upgrades to the London Underground network at Arnos Grove, including station access improvements such as the installation of lifts, supporting long-term step-free access and enhanced streetscape improvements for user safety. However, TfL notes that there is no funding available for a rapid transit route and suggests reallocating contributions intended for this towards supporting the recently introduced SL1 express bus service, including enhanced bus priority and infrastructure. Additionally, TfL recommends amending the development's parking policy to align with the London Plan by minimising parking for all uses. Any streetscape improvements impacting the North Circular Road should be agreed with TfL, and there should be no direct vehicle access from this road. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA7.2: Aldi, New Southgate (formerly Homebase)** | Thames Water recommends that developers and the Local Planning Authority liaise with them early to agree on a housing phasing plan for developments in the catchment area. This is to ensure that water supply network infrastructure upgrades are completed before the occupation of new developments. Without early coordination, planning conditions may be imposed to control the phasing of development to prevent outpacing the delivery of essential upgrades. Developers can request information on network infrastructure through the Thames Water website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA7.2: Aldi, New Southgate (formerly Homebase)** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA7.2: Aldi, New Southgate (formerly Homebase)** | The Draft Local Plan Policy H1 allocates the Former Gasholder site (SA7.1) and the Aldi site (SA7.2) for residential development, emphasising brownfield site prioritisation. Builder Depot Group supports these allocations but suggests updating the land use requirement to explicitly include employment and/or retail uses. Additionally, they question the need for references to funding TfL upgrades through Section 106 contributions, advocating instead for the use of Community Infrastructure Levy (CIL) funds. Therefore, they request the removal of these references in the allocations to align with Regulation 59(2) of the Community Infrastructure Levy Regulations (2010). Please consider these proposed amendments to ensure the policy accurately reflects sustainable development practices. | The council appreciates The Builder Depot's support and acknowledges the concerns regarding the wording of the policy. The Council will continue to engage with The Builder Depot Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01940 | Builder Depot Group |
| **SA7.3: Ladderswood Estate** | The NHS London Healthy Urban Development Unit notes that sites SA7.1, SA7.3, and SA7.4 are expected to deliver housing within the next five years. They welcome discussions as soon as possible to address how the healthcare requirements for the area will be accommodated following the anticipated population increase. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |

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| **SA7.3: Ladderswood Estate** | TfL welcomes the requirement for contributions towards identified upgrades to the London Underground network serving Arnos Grove, including potential funding for station access improvements such as lift installations for step-free access and streetscape enhancements. TfL notes the requirement for limited parking but emphasizes that, due to the PTAL of 5, the site must be a car-free development to ensure consistency with the London Plan. They urge the Council to clarify that any parking provided must be limited to returning residents with an existing car in an estate regeneration scheme. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA7.3: Ladderswood Estate** | Based on available data, the Environment Agency identifies that several sites, including Site SA7.3, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA7.3 specifically be classified within Flood Zone 2 and Flood Zone 3 and 3b. Appendix C (page 422) states flood zone 'No'. This is incorrect. | The council welcomes the feedback and for highlighting the flood risk data for Site SA7.3. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | Yes | 01926 | Environment Agency |
| **SA7.3: Ladderswood Estate** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA7.3: Ladderswood Estate** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA7.3: Ladderswood Estate** | In addition to supporting the delivery of new housing to meet Enfield's requirements, New Ladderswood LLP requests that the policy be amended to allow flexibility for varying housing types on the Site, including co-living and student accommodation. The draft Site Allocation should encourage regeneration that can deliver different residential types to meet diverse needs. This flexibility will ensure the draft Local Plan effectively provides a mixture of new and affordable homes. Suggested amendments to draft Local Plan re: Site Allocation SA7.3 page 422 Land Use Requirement<br>Estate regeneration to deliver new homes (which may include co-living and student accommodation) and supporting open space improvements and social/community infrastructure and other flexible non-residential floorspace. | The Council appreciates New Ladderswood LLP's support and suggestions for the Site Allocation. The Enfield Local Housing Needs Assessment and the Housing Topic Paper emphasize the necessity of diverse housing types to meet various needs. The proposed flexibility to include co-living and student accommodation aligns with the strategic goals of the Local Plan to deliver a mixture of new and affordable homes. The Council will consider amending the Site Allocation to reflect this flexibility, ensuring comprehensive and inclusive housing solutions. | No | 02090 | New Ladderswood LLP |
| **SA7.3: Ladderswood Estate** | The Design Principles for the Site Allocation specify that building heights should decrease from Station Road towards Upper Park Road and that tall buildings are not appropriate for the site. This is not supported by New Ladderswood LLP. The policy wording should be amended to allow flexibility for tall buildings to be considered throughout the site, as precise heights should be determined through a design-led approach. These amendments will ensure the Local Plan is flexible, the site is deliverable, and the policy is effective, in accordance with paragraph 35 criterion c) of the NPPF. Suggested amendments to draft Local Plan re: Site Allocation SA7.3 page 423: Design Principles Development on site: G. must decrease in height from the existing building frontage along Station Road towards Upper Park Road. Tall buildings ~~are not considered appropriate on this site.~~ and | The Council acknowledges New Ladderswood LLP's feedback regarding the Design Principles for Site Allocation SA7.3. The Enfield Local Plan's design and character evidence base supports a design-led approach that responds to the local context and urban character. Flexibility in building heights can facilitate innovative design solutions and ensure the site's deliverability while maintaining sensitivity to surrounding areas. Therefore, the Council will consider revising the policy wording to incorporate flexibility for building heights, ensuring the Local Plan remains effective and adaptable. | No | 02090 | New Ladderswood LLP |

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| | the precise heights of the development should be developed through a design-led approach. | | | | |
| **SA7.3: Ladderswood Estate** | In summary, New Ladderswood LLP supports the principle of Site Allocation SA7.3 Ladderswood Estate for estate regeneration. However, certain policy items in their current form would constrain redevelopment options, making them ineffective and inconsistent with national policy. Thus, the draft Local Plan, as it stands, is not sound. With the suggested amendments, they believe the draft Local Plan would be sound. | The Council appreciates New Ladderswood LLP's support for the principle of Site Allocation SA7.3 Ladderswood Estate. The Council acknowledges the concerns raised regarding certain policy constraints and their potential impact on redevelopment options. The Council believes that the draft Local Plan, including Site Allocation SA7.3, is justified by the evidence base, as outlined in the Enfield Local Housing Needs Assessment and Housing Topic Paper. However, the Council is committed to ongoing dialogue and will consider the suggested amendments to ensure the plan is effective, flexible, and consistent with national policy. The Council look forward to working together to refine the Local Plan, ensuring it meets the needs of all stakeholders. | No | 02090 | New Ladderswood LLP |
| **SA7.4: Arnos Grove Station Car Park** | The NHS London Healthy Urban Development Unit notes that sites SA7.1, SA7.3, and SA7.4 are expected to deliver housing within the next five years. They welcome discussions as soon as possible to address how the healthcare requirements for the area will be accommodated following the anticipated population increase. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01872 | NHS London Healthy Urban Development Unit |
| **SA7.4: Arnos Grove Station Car Park** | TfL welcomes the requirement for contributions towards identified upgrades to the London Underground network serving Arnos Grove. This could include funding for station access improvements, such as lift installations for step-free access, and streetscape enhancements to improve accessibility and safety for station users. However, TfL notes that, due to the PTAL of 6a, the site must be a car-free development to ensure consistency with the London Plan, rather than just providing limited parking. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA7.4: Arnos Grove Station Car Park** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA7.4: Arnos Grove Station Car Park** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA7.5: Coppice Wood Lodge** | TfL notes the reference to contributions for a rapid transit route but reiterates that there is no funding or commitment for an East West Transit route. They suggest that contributions would be better directed towards supporting the recently introduced SL1 limited stop express bus service, including enhanced bus priority and improved infrastructure. TfL recommends changing the wording to reflect this. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA7.5: Coppice Wood Lodge** | Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **SA7.5: Coppice Wood Lodge** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA8.1: Morrisons, Palmers Green** | Historic England recommends strengthening the design principles for heritage-sensitive areas, clarifying GLAAS consultation requirements, and providing explanations of the colour coding in the heritage considerations boxes where applicable. For Policy SA6.1, they suggest adding a new bullet point (bullet point P) under the design principles to include: "Must demonstrate how it has responded to the significance of any potentially affected heritage assets and pay appropriate regard to the guidance within the Character of Growth study, relevant conservation area appraisals and conservation area management plans." | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **SA8.1: Morrisons, Palmers Green** | TfL notes the reference to contributions for a rapid transit route but reiterates that there is no funding or commitment for an East West Transit route. They suggest that contributions would be better directed towards supporting the recently introduced SL1 limited stop express bus service, including enhanced bus priority and improved infrastructure, and recommend changing the wording to reflect this. TfL welcomes the requirement for a car-free approach for residential uses. They also recommend that car parking for any commercial uses, including the re-provided retail store, must be minimized and in line with the London Plan maximum standards for a site with a PTAL of 3. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA8.1: Morrisons, Palmers Green** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA8.1: Morrisons, Palmers Green as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA8.1 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA8.1, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **SA8.1: Morrisons, Palmers Green** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA8.1: Morrisons, Palmers Green** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **SA8.1: Morrisons, Palmers Green** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA8.1: Morrisons, Palmers Green** | The Enfield Society argues that the proposed 130 dwellings on this site are not justified, as it would necessitate a 24-meter tall building. They believe this would harm the character of the Lakes Estate Conservation Area and the Broomfield Park Registered Historic Park, compromising the historical and architectural integrity of these areas. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SA8.2: Lodge Drive Car Park** | TfL notes the reference to contributions for a rapid transit route but reiterates that there is no funding or commitment for an East West Transit route. They suggest that contributions would be better directed towards supporting the recently introduced SL1 limited stop express bus service, including enhanced bus priority and improved infrastructure, and recommend changing the wording to reflect this. TfL also notes the requirement for limited residential parking but suggests it should be amended to state that parking must be minimised. Additionally, they recommend clarifying that the existing car park should not be re-provided. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA8.2: Lodge Drive Car Park** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA8.2: Lodge Drive Car Park as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA8.2 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA8.2, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **SA8.2: Lodge Drive Car Park** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA8.2: Lodge Drive Car Park** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **SA8.2: Lodge Drive Car Park** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA8.2: Lodge Drive Car Park** | LBESPS supports the allocation of Lodge Drive Car Park (SA8.2) for new homes and potential school expansion. They agree with the proposed residential development, subject to detailed design, and support the school's potential expansion, pending further discussions with local education providers. They endorse the proposed highway improvements, subject to further discussions with the highways authority, especially regarding existing traffic patterns at Green Lanes. They support the estimated capacity of 124 new homes and the 10-year development timeframe. The site, being sustainable and accessible near Palmers Green Station, should be prioritized for development. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SA8.3: Corner of Green Lanes and the North Circular** | TfL notes the requirement for limited parking in the development but suggests it should be amended to state that parking must be minimised, including for commercial uses. They support streetscape improvements but emphasize that any proposals affecting the North Circular Road or its frontage should be agreed with TfL. Additionally, there should be no direct vehicle access (for parking or servicing) from the North Circular Road. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA8.3: Corner of Green Lanes and the North Circular** | Based on available data, the Environment Agency identifies that several sites, including Site SA8.3, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA8.3 specifically be classified within Flood Zone 2. | The council welcomes the feedback and for highlighting the flood risk data for Site SA8.3. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | Yes | 01926 | Environment Agency |
| **SA8.3: Corner of Green Lanes and the North Circular** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA8.3: Corner of Green Lanes and the North Circular** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA8.3: Corner of Green Lanes and the North Circular** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | | | | |
| **SA8.4: Travis Perkins, Palmers Green** | TfL welcomes the requirement for car-free residential development. They also suggest that car parking for any commercial uses, including the re-provided Travis Perkins, must be minimised in line with the London Plan maximum standards for a site with a PTAL of 3. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA8.4: Travis Perkins, Palmers Green** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA8.4: Travis Perkins, Palmers Green as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA8.4 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA8.4, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **SA8.4: Travis Perkins, Palmers Green** | Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA8.4: Travis Perkins, Palmers Green** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA8.4: Travis Perkins, Palmers Green** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA10.1: Land at Chase Park** | HCC's response notes that the development at Chase Park (PL10, SA10.1 – SA10.4) could generate similar issues to those identified for Crews Hill, such as ecological impact and increased visitor pressure. However, because Chase Park is located slightly further south, there may be fewer concerns regarding proximity impacts on Hertfordshire. | Comments noted. HCC's concerns regarding the ecological impact and increased visitor pressure from the Chase Park development are acknowledged. The Chase Park Topic Paper outlines Enfield's commitment to integrating Biodiversity Net Gain and thoughtful design to enhance ecological characteristics. Given Chase Park's location further south, the proximity impacts on Hertfordshire are expected to be fewer. Enfield is committed to mitigating recreational impacts through the Enfield Recreation Mitigation Strategy 2023. This strategy includes measures such as managing visitor access, enhancing green spaces, and providing alternative recreational opportunities to reduce pressure on sensitive areas. The forthcoming masterplan will detail Green Infrastructure proposals, ensuring ecological preservation and sustainable development. Enfield will continue to collaborate with stakeholders to address specific concerns and ensure alignment with national policies. | No | 01755 | Hertfordshire County Council - Ecology |

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| **SA10.1: Land at Chase Park** | TfL recommends that the design principles state any car parking must be minimised and aligned with the goal of achieving a 75% sustainable transport mode share. This requires parking to be significantly lower than London Plan maximum standards and should consider future PTAL rather than existing PTAL. Additionally, the infrastructure requirements should explicitly call for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA10.1: Land at Chase Park** | Based on available data, the Environment Agency identifies that several sites, including Site SA10.1, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA10.1 specifically be classified within Flood Zone 2 and Flood Zone 3 and 3b. The EA recommend that any prospective development that comes forward undertakes new modelling to fully understand the flood risks on site. | The Council welcomes the EA's comments regarding Site SA10.1 and its classification within Flood Zones 2, 3, and 3b. The Council acknowledges the Environment Agency's recommendation to reflect the site's flood risk appropriately. We agree that any prospective development on this site should undertake new modelling to fully assess and understand the flood risks. The Council remains committed to working collaboratively with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure that site allocations are compliant with national policy. | Yes | 01926 | Environment Agency |
| **SA10.1: Land at Chase Park** | The equestrian land would need to be strategically identified as surplus or must be replaced to comply with NPPF paragraph 103. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SA10.1: Land at Chase Park** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA10.1: Land at Chase Park** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA10.1: Land at Chase Park** | Trent Park Golf Club supports the Local Plan's objective to release Green Belt land to meet housing targets but suggests that the plan should remain flexible to include new evidence and site submissions. Recently, the club has proposed that a large area of their land, adjacent to the Chase Park SA10.1 allocation, may soon become available due to the decline in viability of the 18-hole golf course. The club recommends that this land be considered either as an extension of the SA10.1 site or as a new allocation (SA10.5) in the Local Plan. This inclusion could enhance the masterplan by offering more housing or lower-density options, improving access to public transport, and providing better connectivity for pedestrians and cyclists. The club emphasizes that keeping the call for sites open and considering this new evidence is necessary to ensure the Local Plan remains justified, sound, and legally compliant. | Comments noted. The Council acknowledges the potential for residential development, open space enhancement, and improved connectivity through active travel infrastructure as part of the broader Chase Park masterplan. We also recognize the declining viability of the 18-hole golf course and the proposal to reduce it to 9 holes, which presents an opportunity for alternative land use. Your proposal will be carefully considered, taking into account its strategic location, contribution to housing delivery, and alignment with sustainable development objectives. | No | 01741 | Trent Park Golf Club |
| **SA10.1: Land at Chase Park** | The Diocese supports the release of Green Belt land at Chase Park for residential-led development, including family homes, affordable housing, and community uses. They emphasize the site's suitability due to its proximity to Enfield Town Centre and transport links. LDF stresses the importance of involving stakeholders in the creation of a masterplan and ensuring that an Infrastructure Delivery Plan is in place to distribute costs fairly and avoid delays in housing delivery. LDF | Comments noted. The Chase Park Topic Paper (2024) provides clear justification for these allocations. The development strategy for Chase Park is built on a landscape-led approach that balances housing needs with environmental sustainability, in line with the objectives of the National Planning Policy Framework (NPPF). The allocations under SA10 and SA10.1 reflect the Council's broader commitment to providing much-needed housing while enhancing green | No | 01913 | Diocese of London |

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| | recommends clarifying and aligning housing requirement figures across the Local Plan and associated documents to ensure consistency and soundness. They suggest that individual sites within the Chase Park allocation should be allowed to come forward independently, as long as they adhere to the overarching policies in the plan, to prevent delays. LDF encourages clear timelines and active stakeholder involvement in developing the masterplan to ensure successful and timely delivery of the site's objectives. They recommend that a detailed Infrastructure Delivery Plan be included in the Local Plan to justify infrastructure needs and costs, ensuring fair distribution across the site allocation. | infrastructure and biodiversity. The Chase Park Topic Paper outlines how site allocations within the area have been carefully assessed to ensure that they contribute positively to local character and environmental goals, which align with both national policy and local needs. The Council remains open to collaboration and will continue to ensure that the Local Plan remains legally compliant and sound, balancing development goals with the protection of key local assets and infrastructure. The Council welcome continued dialogue with stakeholders, including the London Diocese Fund, to ensure that the Local Plan addresses all concerns while meeting the long-term development and sustainability goals of the borough. The Crews Hill Topic Paper and Enfield Viability Update recognize the challenges of developing in areas with environmental constraints like flood zones. The Plan includes strategies to balance these challenges with the need for sustainable development, ensuring that housing targets are met without compromising viability. | | | |
| **SA10.1: Land at Chase Park** | Comer Homes supports the allocation of Chase Park, including Vicarage Farm, as a key placemaking area to help meet Enfield's housing targets, particularly for family and affordable housing. They commend the Council's proactive approach to addressing the housing shortage. However, they raise concerns about specific aspects of Policy PL10. They argue that Vicarage Farm, currently designated as public open space and proposed woodland, is unsuitable for these uses due to its function as a working farm. They also express concerns about the potential road link to Hadley Road, which may impact the farm's viability and development costs, and question its necessity without full assessments. Additionally, they note that the draft map incorrectly designates their site as Ancient Woodland, which could hinder future development. | Support noted. The Council will review the cartography to ensure the accuracy of the Ancient Woodland designation and consider a minor modification to the labelling of large areas of public open space in the illustrative spatial framework. Additionally, comments regarding the road link to Hadley Road have been noted, and the Council will assess its necessity and impact as the plan progresses. | No | 01929 | Comer Homes Group |
| **SA10.1: Land at Chase Park** | Comer Homes supports the Chase Park Placemaking Area as a crucial opportunity to address significant housing needs, acknowledging the flexible use of the term "approximately" for the estimated residential capacity of 3,700 homes, with 2,550 anticipated within the plan period up to 2041. They argue that the policy should clarify that these figures are minimum targets, not maximum limits, to ensure the site fully contributes to housing supply. Comer Homes believes that Chase Park, including Chase Farm, has the potential to deliver more homes than currently identified and that the numbers should not constrain the site's development. | Support for the Chase Park Placemaking Area is noted, and the Council appreciates the feedback regarding the residential capacity figures. The estimated capacity of around 3,700 homes, with 2,550 within the current plan period up to 2041, represents a strategic target that reflects current assessments and constraints. As highlighted in the Site Allocation Topic Paper, the figures provided are based on an understanding of existing infrastructure, environmental considerations, and development feasibility. The use of the term "approximately" in the policy indicates flexibility to accommodate changes in design and demand over time. The Council recognizes the potential for higher residential densities and is committed to ensuring that the Chase Park site can contribute as effectively as possible to meeting housing needs. However, any adjustments to capacity will need to be balanced with detailed masterplanning and infrastructure assessments. The Council will consider all relevant factors to ensure the site is utilized optimally while addressing practical constraints and delivering sustainable development. | No | 01929 | Comer Homes Group |
| **SA10.1: Land at Chase Park** | Comer Homes supports the inclusion of employment-generating uses within the Chase Park development, particularly the integration of small-scale co-working spaces. They emphasize that while these uses are important for creating a vibrant community, the policy should clearly reflect that the primary focus of the development is residential. Point 1 of the policy already notes that development will be residential-led with limited employment uses. Comer Homes suggests that the policy should explicitly acknowledge this to avoid future ambiguity, clarifying that the goal is not to develop a major employment hub but rather to offer flexible spaces for local working and small businesses. | The suggested modifications regarding employment-generating uses within the Chase Park development are not necessary to make the plan sound. The policy, as outlined, aims to incorporate employment uses primarily within the local centre, which inherently limits the scale of these uses. This approach is consistent with the objective of maintaining a residential-led development while providing flexible spaces for small-scale business activities. However, if the Inspector deems that clarifying the policy as suggested would enhance understanding, the Council has no objection to this and will propose it as a minor modification. | No | 01929 | Comer Homes Group |
| **SA10.1: Land at Chase Park** | Comer Homes agrees with Criterion 12d, which emphasizes the importance of responding to the area's topography and the presence of Salmons and Merryhills Brooks. They highlight that areas with lower topography, as illustrated in previous promotion work, can support taller buildings with minimal impact on sensitive landscapes, suggesting this should be explicitly acknowledged in the policy. However, they express concern that Point 12g, which mandates reduced building heights away from the local centre and main transport corridors, contradicts this | The suggested modifications are not necessary to make the plan sound. However, the Council acknowledges the need for clarity in relation to building heights. To address this, we are open to incorporating a minor modification to Criterion 12g by adding "in broad terms" after "building heights should." This adjustment will provide additional flexibility while maintaining the overall intent of the policy to balance topographical considerations with the broader design principles. | No | 01929 | Comer Homes Group |

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| | principle by being overly restrictive. They argue that this could hinder development if it does not align with technical assessments and a landscape-led approach as outlined in Point 12a. | | | | |
| **SA10.1: Land at Chase Park** | Comer Homes expresses concern about Criterion 13c, which calls for the Chase Park Placemaking Area to facilitate a natural extension of Trent Country Park into the northern part of the area. While supportive of the intention to incorporate parkland features such as woodland, trees, and green spaces, they highlight that Vicarage Farm is an active farm and will continue to operate alongside the development. They request that any references to the Country Park be worded flexibly to ensure compatibility with the ongoing agricultural use of the farm. | Comments noted. The Council acknowledges the concern regarding the integration of the natural extension of Trent Country Park with the ongoing use of Vicarage Farm. This aspect will be carefully considered and investigated further during the detailed masterplanning phase to ensure compatibility and practicality. | No | 01929 | Comer Homes Group |
| **SA10.1: Land at Chase Park** | Comer Homes supports the objectives of creating diverse open spaces within the Chase Park Placemaking Area but raises practical concerns regarding the designation of Vicarage Farm, a working farm, as a hilltop view park. The current designation on the Illustrative Framework Plan is impractical because the farm's fields are used for crops and livestock, making public access challenging. They suggest that, while some public access through rural footpaths might be feasible, a formal designation as open space could impact the farm's viability. They recommend reconsidering the open space designation on Vicarage Farm and highlight that ample public open space is already planned within the Chase Farm allocation. | Comments noted. The Council will review the references to Vicarage Farm and how such land is designated, ensuring compatibility with its continued use as a working farm. This issue can be explored further during the detailed masterplanning stage. If necessary, the Council is open to making modifications to improve clarity. | No | 01929 | Comer Homes Group |
| **SA10.1: Land at Chase Park** | Comer Homes comments that while they support the principle of aiming for a high level of biodiversity net gain, the criteria in PL10 should initially require a minimum of 10% net gain, in line with government requirements. They argue that setting a rigid 20% target may be unrealistic at this stage and should be reconsidered, suggesting that a 10% minimum with a target of 20% would be more practical and achievable. | The policy for a 20% BNG is informed by the unique local circumstances and strategic environmental goals outlined in the Blue and Green Enfield evidence base. The higher percentage is aimed at significantly enhancing biodiversity across the borough, aligning with Enfield's broader sustainability and environmental enhancement objectives. While the Environment Act sets a minimum of 10%, local authorities can require higher gains if justified by local conditions and strategic priorities. .The policy aims to enhance public accessibility and the quality of open spaces, which is crucial for supporting community well-being and biodiversity. As indicated in our Blue and Green Enfield strategy, these improvements will be determined through detailed planning applications and development management processes, ensuring that the enhancements are practical and aligned with local needs. | No | 01929 | Comer Homes Group |
| **SA10.1: Land at Chase Park** | Comer Homes supports the principle of providing a new three-form entry primary school near the local centre but emphasizes the need for flexibility in the policy due to recent declines in birth rates. They suggest that the policy should include a provision to review the need for the school based on current demands. Additionally, they raise concerns about placing school playing fields in publicly accessible open space, citing safeguarding issues, and recommend reconsidering this approach to ensure the facilities are appropriately secured. | The Council acknowledges the importance of maintaining flexibility regarding the need for the proposed three-form entry primary school, particularly in light of changing demographic trends. We will consider including a review mechanism in the policy to adapt to future needs. Regarding the provision of playing fields, we understand the concerns about safeguarding and will explore alternatives to ensure school facilities are both secure and accessible. These matters will be addressed further during detailed masterplanning, and we are open to modifying the policy if it enhances clarity and feasibility. | No | 01929 | Comer Homes Group |
| **SA10.1: Land at Chase Park** | Comer Homes supports Policy PL10 but emphasizes the need for flexibility due to viability concerns. They highlight that significant infrastructure costs, such as those for a potential bus route and drainage improvements, as well as affordable housing requirements, may impact the development's feasibility. Comer Homes suggests that the policy should explicitly account for these viability issues and allow flexibility in its application. They also propose that the Council consider a £0 CIL (Community Infrastructure Levy) rate for the Chase Park Placemaking Area to facilitate more effective S106 negotiations and ensure critical infrastructure, like a new school, is delivered without being constrained by CIL costs. Comer Homes will continue to work with the Council to address these issues and refine policy wording as needed. | Comments noted. The Council is committed to working collaboratively with Comer Homes and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01929 | Comer Homes Group |
| **SA10.1: Land at Chase Park** | Lansdown supports the density and phasing approach for the Trent Park Equestrian Centre and emphasizes that it is well-suited for older persons' housing due to its proximity to Oakwood Underground Station and local facilities. They | The Chase Park Topic Paper (2024) highlights the importance of delivering housing in sustainable locations, especially where access to public transport and local services can support a more inclusive and connected community. The Council acknowledges the sustainability benefits of prioritising sites like the Trent | No | 01998 | Landsdown |

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| | suggest prioritizing the site's development due to its sustainability and status as previously developed land. | Park Equestrian Centre, which is classified as previously developed land. This aligns with the broader goals of the Enfield Local Plan, which aims to make efficient use of land while addressing the borough's diverse housing needs, including for older people. The site's strategic location makes it well-suited for development, and the Council will continue to carefully assess its potential through the ongoing planning process to ensure it meets both housing and sustainability objectives. | | | |
| **SA10.1: Land at Chase Park** | Lansdown, promoters of land at Trent Park Equestrian Centre within the Chase Park site allocation (SA 10.1), support Policy H1 on Housing Development Sites, which includes housing for older persons. However, they believe there is a typo in the Estimated Capacity box, which mentions "including 95 homes for older persons," as this does not align with the overall approach of SA10.1, which does not specifically reference these homes. | The Chase Park Topic Paper (2024) emphasizes the flexibility in housing delivery within the SA 10.1 allocation, aiming to meet diverse housing needs, including housing for older persons. The inclusion of a specific reference to 95 homes for older persons in the Estimated Capacity box may indeed be a misalignment with the broader approach of SA10.1, which focuses on overall housing delivery without fixed allocations for particular housing types. As outlined in the Enfield Housing Topic Paper (2024), the Council is committed to ensuring that developments offer a range of housing options, including for older persons, but will ensure that any references in the plan are aligned with the site's comprehensive development strategy. This will be reviewed, and any necessary adjustments will be made to ensure clarity and consistency with the Local Plan's objectives. | No | 01998 | Lansdown |
| **SA10.1: Land at Chase Park** | Thompsons of Crews Hill are object to Policy SA10.1: Land at Chase Park, emphasizing that the Trent Park Equestrian Centre is a significant asset to London, accessible via the Tube and offering city dwellers access to country pursuits in beautiful Green Belt land. The location within the Trent Park Conservation Area will suffer devastating impacts, including the loss of high-quality countryside that provides a clear separation between Oakwood and Enfield. The Equestrian Centre is integral to the local identity, contributing to the area's semi-rural atmosphere. The development threatens the character of 'Garden Centre Alley,' a popular destination that brings revenue and jobs to the area. Residents are concerned about increased traffic, loss of affordable housing, and displacement of local businesses. They argue that other sites, like Méridian Water, remain undeveloped and that developing historic land, once part of royal estates, prioritizes greed over heritage and culture. They also highlight infrastructure concerns, including increased emissions, insufficient healthcare, and police services for the proposed 5,500 homes. They accuse the council of hypocrisy for denying planning permissions to landowners while pushing their own development agenda on Green Belt land. | Comments noted. The concerns raised about the proposed closure of Trent Park Equestrian Centre and the impact on the local identity and countryside is justified in Enfield's Site Allocation Topic Paper. The justification emphasizes that site allocations like SA10.1 are designed to meet the borough's long-term housing and infrastructure needs while also considering environmental sustainability and community well-being. It acknowledges the importance of balancing development with the preservation of green spaces and local character. The proposal for site SA10.1 includes measures to mitigate environmental impacts, preserve local identity, and integrate new developments with existing communities. Furthermore, the allocation strategy aims to optimize land use, focusing on sites that can support growth without compromising essential greenbelt characteristics. This approach reflects a broader commitment to responsible urban planning, ensuring that development is both sustainable and beneficial to the community as a whole. | No | 05244 | Thompsons Garden Centre |
| **SA10.1: Land at Chase Park** | Fairview supports the Local Plan and the allocation of Chase Park, including the land in their ownership, Land South of Enfield Road, for development. They state there are no significant infrastructure or environmental barriers that could delay the project. Fairview, an experienced house builder, plans to deliver a mix of flatted and family homes, facilitating a quick response to local housing demands. The development is expected to help meet the Borough's housing needs and protect valued landscapes in the area. Fairview supports the council's proactive approach to meeting housing needs but requests more information on the housing target and further clarity. The comments support the Vision for Chase Park and the overall intent of Policy PL10 to create a sustainable new neighborhood with a focus on green infrastructure. However, they suggest several clarifications to enhance the policy's clarity and effectiveness.They note that the current masterplanning framework should not be seen as a strict blueprint but rather as a guiding framework. They recommend rewording Figure 3.2 to emphasize its illustrative nature and inserting a paragraph to clarify this. They also recommend clarifications to figure 3.12, request more flexibility in terms of the site's capacity, and concerns around the prescriptive nature of the some of the requirements. They also suggest lowering the 20% net gain target to 10%, have concerns around the 50% viability requirement and suggest more flexibility is required, and also address concerns around the flexibility of the housing mix policy, and propose various other amendments and clarifications. Overall, the aim is to ensure that the policy is | Comments noted. The Council is committed to working collaboratively with stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01746 | Fairview New Homes |

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| | sound and effectively facilitates future planning applications while addressing the need for a comprehensive approach to development. | | | | |
| **SA10.1: Land at Chase Park** | CPRE London opposes the development of Green Belt land at Chase Park/Trent Park Equestrian Centre (SA10.1), highlighting its importance to the Metropolitan Green Belt and arguing that Enfield has sufficient brownfield land and existing major sites like Meridian Water for housing development. They assert that development would result in the loss of high-quality countryside, closure of the Trent Park Equestrian Centre, and the removal of separation between Oakwood and Enfield. Therefore, they believe this site should be removed from the list of site allocations. | Comments noted. The Council acknowledges CPRE London's concerns about the development of Green Belt land at Chase Park (PL10). The Enfield Local Plan is designed to balance housing needs with environmental preservation. The ELP Spatial Strategy and Overall Approach Topic Paper justifies why some Green Belt land must be allocated to meet housing targets sustainably. The Chase Park Topic Paper 2024 details extensive assessments ensuring the developments are planned thoughtfully, considering environmental and community impacts. The plan prioritizes brownfield sites and protects significant green spaces where possible to maintain the area's character and identity. | No | 01726 | CPRE London |
| **SA10.1: Land at Chase Park** | Enfield Road Watch's response to the local plan highlights several concerns. They dispute Design Principle D's characterization of Enfield Road as a "highways dominated space," emphasizing its urban-rural interface and separation between Enfield Town and Oakwood. They question the replacement of the 2021 Green Belt study, arguing the fields south of Enfield Road should qualify as a Site of Importance for Nature Conservation due to their ecological richness. The response also underscores the area's historic significance, criticizes the plan for not respecting local character and design codes, and opposes including Trent Park Equestrian Centre in the development area due to its recreational and historical value. | Comments noted. The Council's plan aligns with strategic priorities and has undergone thorough consultation and cooperation with stakeholders and adjacent authorities, ensuring compliance with broader regional goals (Duty to Cooperate Statement). The ELP Spatial Strategy outlines a balanced approach to development, focusing on sustainability and preserving essential green spaces (ELP Spatial Strategy and Overall Approach Topic Paper). Furthermore, the Chase Park Topic Paper highlights the planned green infrastructure and recreational benefits, addressing the perceived loss of green space by creating high-quality new parks and open spaces. Alternatives have been explored and assessed in the Integrated Impact Assessment (IIA), demonstrating a thorough consideration of various options to meet housing needs sustainably. | No | 01687 | Enfield Road Watch |
| **SA10.1: Land at Chase Park** | The Councillor raises significant concerns regarding site allocation policies SA10.1, 10.2, 10.3, and 10.4, particularly around the area's limited public transport, increased traffic congestion, and the detrimental impact on the character and countryside of the Enfield Chase Area of Special Character. The development would lead to the urbanization of this historically significant area, affecting the Trent Park Conservation Area and its historic landscape. Additionally, the loss of green spaces essential for physical and mental health, as emphasized by Historic England, is a major concern. The Councillor deems the proposal unsound and recommends its removal from the draft plan. He advocates for the exclusion of the Chase Village development and urges Enfield Council to prioritize the development of brownfield sites, thereby preserving the valuable Green Belt. | Comments noted. The concerns raised about the Chase Park development proposal are acknowledged, particularly regarding public transport limitations, potential traffic congestion, and the impact on the area's character. Policy PL10 is supported by extensive evidence base, in particular the Chase Park Topic Paper which outlines extensive transport improvements, including new bus routes and cycle paths to enhance connectivity. The plan also incorporates significant green spaces, mitigating environmental impacts and preserving public amenities. These measures, aligned with the National Planning Policy Framework, ensure the development is sustainable, balancing growth with environmental and community needs. Further details can be found in the Chase Park Topic Paper. | No | 01779 | Cllr Fallart |
| **SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)** | HCC's response notes that the development at Chase Park (PL10, SA10.1 – SA10.4) could generate similar issues to those identified for Crews Hill, such as ecological impact and increased visitor pressure. However, because Chase Park is located slightly further south, there may be fewer concerns regarding proximity impacts on Hertfordshire. | Comments noted. HCC's concerns regarding the ecological impact and increased visitor pressure from the Chase Park development are acknowledged. The Chase Park Topic Paper outlines Enfield's commitment to integrating Biodiversity Net Gain and thoughtful design to enhance ecological characteristics. Given Chase Park's location further south, the proximity impacts on Hertfordshire are expected to be fewer. Enfield is committed to mitigating recreational impacts through the Enfield Recreation Mitigation Strategy 2023. This strategy includes measures such as managing visitor access, enhancing green spaces, and providing alternative recreational opportunities to reduce pressure on sensitive areas. The forthcoming masterplan will detail Green Infrastructure proposals, ensuring ecological preservation and sustainable development. Enfield will continue to collaborate with stakeholders to address specific concerns and ensure alignment with national policies. | No | 01755 | Hertfordshire County Council - Ecology |
| **SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66** | TfL recommends that the design principles state any car parking must be minimised and aligned with the goal of achieving a 75% sustainable transport mode share. This requires parking to be significantly lower than London Plan maximum standards and should consider future PTAL rather than existing PTAL. Additionally, the infrastructure requirements should explicitly call for substantial | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| **The Ridgeway (west)** | contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough. | | | | |
| **SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)** | Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)** | Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2 support the strategic approach of Policy SS1 in delivering the housing target for Enfield, particularly through the Chase Park urban extension (PL10). However, they argue that the land to the west of Arnold House within SA10.2 has not been adequately explored in the Reg 19 Local Plan and could contribute additional housing early in the plan period. They emphasize the need for a comprehensive and coordinated approach to development, including a west-to-east link from Chase Park through SA10.2 to The Ridgeway and Gordon Hill. The consortium of landowners should be more actively involved in discussions and the Chase Park developer forum, as they have not been included thus far. They also propose that Policy SS1 be amended to incorporate the opportunities identified in the Initial Concept Layout Document for SA10.2, to ensure the delivery of sustainable and well-integrated development. | Support noted. The suggested modifications are not needed to make the plan sound but further exploration of east - east connections will be made through the next phase of masterplanning. | No | 01927 | Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2 |
| **SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)** | Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2 express concerns regarding Policy SS2, which mandates that all developments contribute positively to sustainable development and require masterplans, particularly for sites with multiple owners. They highlight that SA10.2 is crucial for linking Chase Park to The Ridgeway and Gordon Hill. However, the consortium has not been included in the Chase Park developer forums, which impedes achieving the necessary sustainable and green infrastructure links. They argue that without the consortium's involvement, the Council's strategy for creating sustainable places is unachievable and fails to meet NPPF sustainability requirements. They recommend that Policy SS2 be modified to specify how the consortium will be engaged to ensure effective delivery of these strategic sustainability links. | Support noted. The suggested modifications are not needed to make the plan sound but further exploration of east - east connections will be made through the next phase of masterplanning. | No | 01927 | Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2 |
| **SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)** | Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2 support the principle of Policy PL10 for Chase Park Placemaking Area (CPPA), which aims to deliver around 3,700 new homes, with 2,550 expected by 2041 and the remainder beyond. They agree with the flexible housing approach but criticize the policy for not detailing how the proposed pedestrian, cycle, and vehicular link from SA10.2 to The Ridgeway will be delivered. The consortium, not yet involved in the CPPA developer forums, argues that the Local Plan overlooks the potential for additional housing on the southern part of SA10.2, which could facilitate the required link and provide early housing delivery. They propose an infill development of approximately 100 dwellings, which would meet exceptional | Support noted. The suggested modifications are not needed to make the plan sound but further exploration of east - east connections will be made through the next phase of masterplanning. | No | 01927 | Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2 |

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| | circumstances, enhance green infrastructure, and align with sustainability goals. They assert that without this inclusion, Policy PL10 fails to meet NPPF sustainability standards and is not a fully justified strategy for the urban extension. | | | | |
| **SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)** | Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2 have raised concerns about Policy H1, which identifies housing development sites. They note a discrepancy between the estimated capacity of 3,600 homes mentioned in Policy H1 for the Chase Park urban extension (including SA10.2) and the 3,700 dwellings referred to in Policy PL10. Policy H1 lacks specific details on the number of dwellings allocated for SA10.2, particularly the potential additional capacity in the western part of the site. This potential, mentioned in Appendix C of the Reg 19 Local Plan, is not reflected in Policies H1, PL10, or the illustrative framework plan (Figure 3.12). The consortium argues that this inconsistency requires a more detailed policy to address housing delivery on the land west of Arnold House and to align with the overall development strategy. | Support noted. The suggested modifications are not needed to make the plan sound but further exploration of east - east connections will be made through the next phase of masterplanning. | No | 01927 | Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2 |
| **SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)** | Enfield Road Watch's response to the Local Plan expresses concerns about the handling of the planning application for Arnold House's demolition. They argue the access road to the proposed Chase Park development was not transparently communicated, potentially harming the Vicarage Farm and Rifles Site SINC, contradicting NPPF Paragraph 185a. Additionally, they claim the area's slope and gradient do not support active travel, making the development unsustainable. | Comments noted. The plan ensures compliance with NPPF guidelines by mapping and safeguarding local wildlife habitats, thus supporting sustainable growth and protecting ecological networks. | No | 01687 | Enfield Road Watch |
| **SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)** | The Councillor raises significant concerns regarding site allocation policies SA10.1, 10.2, 10.3, and 10.4, particularly around the area's limited public transport, increased traffic congestion, and the detrimental impact on the character and countryside of the Enfield Chase Area of Special Character. The development would lead to the urbanization of this historically significant area, affecting the Trent Park Conservation Area and its historic landscape. Additionally, the loss of green spaces essential for physical and mental health, as emphasized by Historic England, is a major concern. The Councillor deems the proposal unsound and recommends its removal from the draft plan. He advocates for the exclusion of the Chase Village development and urges Enfield Council to prioritize the development of brownfield sites, thereby preserving the valuable Green Belt. | Comments noted. The concerns raised about the Chase Park development proposal are acknowledged, particularly regarding public transport limitations, potential traffic congestion, and the impact on the area's character. Policy PL10 is supported by extensive evidence base, in particular the Chase Park Topic Paper which outlines extensive transport improvements, including new bus routes and cycle paths to enhance connectivity. The plan also incorporates significant green spaces, mitigating environmental impacts and preserving public amenities. These measures, aligned with the National Planning Policy Framework, ensure the development is sustainable, balancing growth with environmental and community needs. Further details can be found in the Chase Park Topic Paper. | No | 01779 | Cllr Fallart |
| **SA10.3: Chase Park North East** | HCC's response notes that the development at Chase Park (PL10, SA10.1 – SA10.4) could generate similar issues to those identified for Crews Hill, such as ecological impact and increased visitor pressure. However, because Chase Park is located slightly further south, there may be fewer concerns regarding proximity impacts on Hertfordshire. | Comments noted. HCC's concerns regarding the ecological impact and increased visitor pressure from the Chase Park development are acknowledged. The Chase Park Topic Paper outlines Enfield's commitment to integrating Biodiversity Net Gain and thoughtful design to enhance ecological characteristics. Given Chase Park's location further south, the proximity impacts on Hertfordshire are expected to be fewer. Enfield is committed to mitigating recreational impacts through the Enfield Recreation Mitigation Strategy 2023. This strategy includes measures such as managing visitor access, enhancing green spaces, and providing alternative recreational opportunities to reduce pressure on sensitive areas. The forthcoming masterplan will detail Green Infrastructure proposals, ensuring ecological preservation and sustainable development. Enfield will continue to collaborate with stakeholders to address specific concerns and ensure alignment with national policies. | No | 01755 | Hertfordshire County Council - Ecology |
| **SA10.3: Chase Park North East** | TfL recommends that the design principles state any car parking must be minimised and consistent with the ambition of achieving a 75% sustainable transport mode share, requiring substantially lower parking levels than London Plan maximum standards and considering future PTAL rather than existing PTAL. Despite the reference to a primary street suitable for buses in the design | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| | principles, the infrastructure requirements should explicitly call for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough. Additionally, a costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Chase Park sites. TfL is concerned that dividing the Chase Park placemaking area into four separate site allocations could lead to parts being developed before agreeing on the necessary infrastructure requirements and costs for the entire area. | | | | |
| **SA10.3: Chase Park North East** | Based on available data, the Environment Agency identifies that several sites, including Site SA10.3, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA10.3 specifically be classified within Flood Zone 2 and Flood Zone 3 and 3b. The EA recommend that any prospective development that comes forward undertakes new modelling to fully understand the flood risks on site. | The Council welcomes the EA's comments regarding Site SA10.3 and its classification within Flood Zones 2, 3, and 3b. The Council acknowledges the Environment Agency's recommendation to reflect the site's flood risk appropriately. We agree that any prospective development on this site should undertake new modelling to fully assess and understand the flood risks. The Council remains committed to working collaboratively with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure that site allocations are compliant with national policy. | Yes | 01926 | Environment Agency |
| **SA10.3: Chase Park North East** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA10.3: Chase Park North East** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA10.3: Chase Park North East** | Enfield Road Watch's response to the local plan highlights several concerns regarding the extension of Trent Country Park. They argue that Vicarage Farm already serves as an extension to the historic park, preserving its landscape setting and providing wildlife habitats. The creation of new viewpoints would replace valued rural views with urbanized landscapes. Additionally, they emphasize that the topography of site SA10.3 discourages active travel due to slopes and gradients, making it likely car-dependent and thus unsustainable. | Comments noted. While Enfield Road Watch raises valid points about the current role of Vicarage Farm in preserving the historic landscape and wildlife habitats, the proposed extension of Trent Country Park as outlined in the Chase Park Topic Paper aims to enhance these qualities further by integrating new parks and open spaces. The plan includes careful consideration of the area's topography, aiming to balance development with the preservation of key views and promoting sustainable travel options where feasible. Active travel routes are designed to mitigate the impact of slopes and gradients, ensuring that new developments contribute positively to the overall landscape and community connectivity. | No | 01687 | Enfield Road Watch |
| **SA10.3: Chase Park North East** | The Enfield Society raises concerns that new neighbourhoods in areas SA10.3 and SA10.4 are being planned with the assumption of a new bus route through the Country Park extension to meet the 400m maximum distance to a bus stop as required. They argue that proximity to a bus stop does not guarantee effective public transport access, particularly as details about the destinations and frequency of the proposed service are unclear. Additionally, any new service might require passengers to change buses at Chase Farm Hospital, raising doubts about the overall efficacy of the proposed public transport provision. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |

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| **SA10.3: Chase Park North East** | The Councillor raises significant concerns regarding site allocation policies SA10.1, 10.2, 10.3, and 10.4, particularly around the area's limited public transport, increased traffic congestion, and the detrimental impact on the character and countryside of the Enfield Chase Area of Special Character. The development would lead to the urbanization of this historically significant area, affecting the Trent Park Conservation Area and its historic landscape. Additionally, the loss of green spaces essential for physical and mental health, as emphasized by Historic England, is a major concern. The Councillor deems the proposal unsound and recommends its removal from the draft plan. He advocates for the exclusion of the Chase Village development and urges Enfield Council to prioritize the development of brownfield sites, thereby preserving the valuable Green Belt. | Comments noted. The concerns raised about the Chase Park development proposal are acknowledged, particularly regarding public transport limitations, potential traffic congestion, and the impact on the area's character. Policy PL10 is supported by extensive evidence base, in particular the Chase Park Topic Paper which outlines extensive transport improvements, including new bus routes and cycle paths to enhance connectivity. The plan also incorporates significant green spaces, mitigating environmental impacts and preserving public amenities. These measures, aligned with the National Planning Policy Framework, ensure the development is sustainable, balancing growth with environmental and community needs. Further details can be found in the Chase Park Topic Paper. | No | 01779 | Cllr Fallart |
| **SA10.4: Chase Park North West** | HCC's response notes that the development at Chase Park (PL10, SA10.1 – SA10.4) could generate similar issues to those identified for Crews Hill, such as ecological impact and increased visitor pressure. However, because Chase Park is located slightly further south, there may be fewer concerns regarding proximity impacts on Hertfordshire. | Comments noted. HCC's concerns regarding the ecological impact and increased visitor pressure from the Chase Park development are acknowledged. The Chase Park Topic Paper outlines Enfield's commitment to integrating Biodiversity Net Gain and thoughtful design to enhance ecological characteristics. Given Chase Park's location further south, the proximity impacts on Hertfordshire are expected to be fewer. Enfield is committed to mitigating recreational impacts through the Enfield Recreation Mitigation Strategy 2023. This strategy includes measures such as managing visitor access, enhancing green spaces, and providing alternative recreational opportunities to reduce pressure on sensitive areas. The forthcoming masterplan will detail Green Infrastructure proposals, ensuring ecological preservation and sustainable development. Enfield will continue to collaborate with stakeholders to address specific concerns and ensure alignment with national policies. | Yes | 01755 | Hertfordshire County Council - Ecology |
| **SA10.4: Chase Park North West** | TfL recommends that the design principles state any car parking must be minimised and consistent with the ambition of achieving a 75% sustainable transport mode share, requiring substantially lower parking levels than London Plan maximum standards and considering future PTAL rather than existing PTAL. Despite the reference to a primary street suitable for buses in the design principles, the infrastructure requirements should explicitly call for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough. Additionally, a costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Chase Park sites. TfL is concerned that dividing the Chase Park placemaking area into four separate site allocations could lead to parts being developed before agreeing on the necessary infrastructure requirements and costs for the entire area. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA10.4: Chase Park North West** | Based on available data, the Environment Agency identifies that several sites, including Site SA10.4, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA10.4 specifically be classified within Flood Zone 2 and Flood Zone 3 and 3b. The EA recommend that any prospective development that comes forward undertakes new modelling to fully understand the flood risks on site. | The Council welcomes the EA's comments regarding Site SA10.4 and its classification within Flood Zones 2, 3, and 3b. The Council acknowledges the Environment Agency's recommendation to reflect the site's flood risk appropriately. We agree that any prospective development on this site should undertake new modelling to fully assess and understand the flood risks. The Council remains committed to working collaboratively with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure that site allocations are compliant with national policy. | Yes | 01926 | Environment Agency |
| **SA10.4: Chase Park North West** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | | | | |
| **SA10.4: Chase Park North West** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA10.4: Chase Park North West** | The Enfield Society raises concerns that new neighbourhoods in areas SA10.3 and SA10.4 are being planned with the assumption of a new bus route through the Country Park extension to meet the 400m maximum distance to a bus stop as required. They argue that proximity to a bus stop does not guarantee effective public transport access, particularly as details about the destinations and frequency of the proposed service are unclear. Additionally, any new service might require passengers to change buses at Chase Farm Hospital, raising doubts about the overall efficacy of the proposed public transport provision. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SA10.4: Chase Park North West** | The Councillor raises significant concerns regarding site allocation policies SA10.1, 10.2, 10.3, and 10.4, particularly around the area's limited public transport, increased traffic congestion, and the detrimental impact on the character and countryside of the Enfield Chase Area of Special Character. The development would lead to the urbanization of this historically significant area, affecting the Trent Park Conservation Area and its historic landscape. Additionally, the loss of green spaces essential for physical and mental health, as emphasized by Historic England, is a major concern. The Councillor deems the proposal unsound and recommends its removal from the draft plan. He advocates for the exclusion of the Chase Village development and urges Enfield Council to prioritize the development of brownfield sites, thereby preserving the valuable Green Belt. | Comments noted. The concerns raised about the Chase Park development proposal are acknowledged, particularly regarding public transport limitations, potential traffic congestion, and the impact on the area's character. Policy PL10 is supported by extensive evidence base, in particular the Chase Park Topic Paper which outlines extensive transport improvements, including new bus routes and cycle paths to enhance connectivity. The plan also incorporates significant green spaces, mitigating environmental impacts and preserving public amenities. These measures, aligned with the National Planning Policy Framework, ensure the development is sustainable, balancing growth with environmental and community needs. Further details can be found in the Chase Park Topic Paper. | No | 01779 | Cllr Fallart |
| **SA11.1: Land at Crews Hill** | HCC's response highlights that the site (SA11.1) contains areas of the main river Turkey Brook, which drains areas of Hertfordshire. Any new outfalls must restrict discharge rates and volumes to greenfield levels to ensure upstream areas in Hertfordshire can drain effectively. The site also includes areas within Flood Zone 2 and 3, and HCC recommends consulting the Environment Agency on any proposals for this site. | Comments noted. The Council will ensure early engagement between Enfield LLFA and developers to address these recommendations. The Council will seek to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and the Environment Agency. | Yes | 01755 | Hertfordshire County Council as Lead Local Flood Authority (LLFA) |
| **SA11.1: Land at Crews Hill** | HCC views the PL11 (SA11.1 – SA 11.6) Crews Hill development as having a slightly negative ecological impact on Hertfordshire, reducing habitat extent and connectivity. The mixed-use area will shift from agriculture, development, and leisure to potentially enhance some ecological features through Biodiversity Net Gain initiatives. Although the current land lacks substantial ecological interest, indirect impacts like increased visitor pressure on local wildlife sites and reserves are uncertain. The extent of these impacts depends on the Green Infrastructure proposals for Crews Hill within Enfield, which are currently unknown. | Comments noted. The Crews Hill Topic Paper and supporting evidence emphasize Enfield's commitment to integrating Biodiversity Net Gain initiatives and thoughtful design into the Crews Hill development. The development is designed to enhance ecological characteristics, and a forthcoming Supplementary Planning Document (SPD) will address Green Infrastructure (GI) proposals, ensuring a balanced approach to ecological preservation and development. Additionally, early engagement between Enfield's Local Lead Flood Authority (LLFA) and developers is planned to manage ecological impacts effectively. The council will also prepare a Statement of Common Ground with HCC and the Environment Agency to address specific concerns and ensure adherence to national policy and best practices. This collaborative approach aims to mitigate potential negative impacts and optimize ecological benefits for both Enfield and Hertfordshire. | No | 01755 | Hertfordshire County Council - Ecology |

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| **SA11.1: Land at Crews Hill** | TfL recommends that the requirements state any car parking must be minimized and align with the ambition of achieving a 75% sustainable transport mode share, requiring parking levels substantially lower than London Plan maximum standards and considering future rather than existing PTAL. While there is a requirement for a public transport bridge over the railway, the infrastructure requirements should also explicitly call for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough. TfL notes the absence of a reference to development being within 400 meters of a bus stop, which is included in the design principles for SA11.1 and SA11.3. A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that dividing the Crews Hill placemaking area into six separate site allocations could lead to parts being developed before agreeing on the necessary infrastructure requirements and costs for the entire area. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA11.1: Land at Crews Hill** | Based on available data, the Environment Agency identifies that several sites, including Site SA11.1, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA11.1 specifically be classified within Flood Zone 2 and Flood Zone 3. | The Council welcomes the EA's comments regarding Site SA11.1 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **SA11.1: Land at Crews Hill** | Within the land use requirements there is mention of formal play and playing pitch provision but in the infrastructure requirements under the proposal, there is no mention of formal sport and recreational provision. Sport England would like to see a line referencing the need for on-site formal sport and playing fields. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SA11.1: Land at Crews Hill** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA11.1: Land at Crews Hill** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA11.1: Land at Crews Hill** | Berkeley Homes supports the allocation of land at Crews Hill for residential-led mixed-use development under Strategic Policy PL11, acknowledging the plan's aim to create a sustainable new settlement centered around the existing train station. Berkeley owns several land parcels within this area, including the Owls Hall Estate, which is also covered by Site Allocation SA11.1. Berkeley generally agrees with the allocation policy for SA11.1 but suggests modifications to better reflect the development's feasibility and to align with the Local Plan's broader objectives. Key points include: 1) Housing Capacity: Berkeley proposes adjusting the estimated housing capacity for SA11.1 from 800 to approximately 650 homes, based on their assessments of site constraints and infrastructure needs. 2) Infrastructure Requirements: Berkeley supports the need for a comprehensive infrastructure plan but argues against overly prescriptive requirements at this | The Council welcomes Berkeley Homes' support for the allocation of land at Crews Hill and appreciates their commitment to the strategic aims of Policy PL11. We are encouraged by their constructive feedback on Site Allocation SA11.1 and value their detailed analysis. The Council acknowledges Berkeley's suggestion to modify the estimated housing capacity for SA11.1. While we understand the rationale behind this suggestion, our recent work on spatial frameworks indicates that the current capacity estimate is achievable. Further masterplanning will refine these estimates and ensure they are aligned with the site's constraints and opportunities. Detailed proposals, to be submitted with planning applications, will be assessed based on comprehensive supporting work, so we believe that a modification at this stage is not necessary to ensure the plan's soundness. Regarding the suggested changes to infrastructure requirements, the Council maintains that the existing | No | 01916 | Berkeley Homes (North East London) Ltd |

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| | stage. Specifically, they challenge the necessity of a new public transport bridge and a primary school as mandated by the current policy. Berkeley believes that these infrastructure elements should be determined through detailed masterplanning rather than being set in the allocation policy. Policy Modifications: 1) Housing Capacity: Update the policy to reflect the revised estimate of 650 homes for clarity. 2) Infrastructure Flexibility: Amend the policy to ensure that infrastructure provisions, such as the bridge and school, are flexible and determined in subsequent planning stages rather than being fixed at this stage. 3) Masterplan Framework: Ensure that detailed infrastructure requirements are addressed through the masterplan framework (SPD) rather than being preemptively set in the allocation policy. Berkeley emphasizes that these changes are intended to make the policy more practical and aligned with ongoing planning processes, without altering the overall soundness of the Crews Hill Placemaking Area. They advocate for continued collaboration to develop a Statement of Common Ground (SoCG) to address these issues and refine the Local Plan. | plan adequately addresses these needs. The Local Plan outlines that additional infrastructure work will be undertaken through a subsequent SPD or similar framework. This approach allows for detailed assessment and refinement of infrastructure needs, ensuring that the development is supported effectively. As such, we believe that the proposed modifications to infrastructure requirements are not required to make the plan sound. The Council is committed to working with Berkeley Homes and other stakeholders on a Statement of Common Ground (SoCG) to address any outstanding issues and further refine the plan. This collaborative approach will help ensure that the development of Crews Hill meets both current and future needs. | | | |
| **SA11.1: Land at Crews Hill** | Overall, Taylor Wimpey is supportive of the strategic allocation at Crews Hill but raises concerns about the clarity of housing targets, the practicality of masterplanning, and infrastructure planning. Taylor Wimpey's concerns regarding Policy SS1 are as follows, 1) Housing Delivery Test: Enfield is currently failing the Housing Delivery Test, achieving only 73% of the required homes, which triggers the 'tilted balance' as per the NPPF. This necessitates a 20% buffer for land supply due to underdelivery. 2) Housing Shortfall: The Council's housing delivery has been insufficient, with a shortfall of 3,738 homes and an end-loaded delivery trajectory. There is concern over Enfield's ability to meet housing targets due to constraints and delays in large site developments. 3) Inconsistent Targets: There is inconsistency in the housing requirement figures across various documents. Policy SS1 and the Housing Topic Paper show differing targets and available land supply figures, creating confusion over the precise housing need. 4) Exceptional Circumstances: Taylor Wimpey supports the release of Green Belt land, including the Crews Hill site, citing exceptional circumstances such as high housing and employment needs, and the demand for affordable and family housing. 5) Masterplanning Requirements: Part 12 of SS1 requires a masterplan or Supplementary Planning Document (SPD) for new developments like Crews Hill. There are concerns about potential delays if stakeholder engagement and SPD preparation are not timely and coordinated with the Local Plan. 6) Infrastructure Delivery: There is a need for a detailed Infrastructure Delivery Plan to ensure fair distribution of infrastructure costs across sites. The current policy may lead to disproportionate costs for early developments if not properly managed. | The Local Plan acknowledges the shortfall in housing delivery. The stepped trajectory approach accounts for the phasing of large sites and is intended to align with realistic delivery timescales. This approach is supported by the evidence in the Housing Topic Paper, which includes a detailed assessment of housing needs and delivery constraints. The variation in housing figures reflects the complexities of different planning contexts and stages of planning. The Enfield Housing Topic Paper (2024, Table 4) provides a revised target of approximately 34,280 homes, aligning with a detailed assessment of housing need and supply. This figure takes into account both the immediate and long-term housing requirements and is supported by evidence from the Housing Topic Paper and the Enfield Infrastructure Planning evidence base. The justification for Green Belt release is well-documented in the Exceptional Circumstances Topic Paper. The release is necessary to address substantial housing and employment needs, the demand for affordable and family housing, and limitations on urban capacity (Exceptional Circumstances Topic Paper, p. 12). The evidence indicates that relying solely on urban sites would not meet the borough's needs and could impact critical industries in Enfield. The requirement for a masterplan or Supplementary Planning Document (SPD) for strategic areas like Crews Hill ensures comprehensive planning and stakeholder engagement. The Crews Hill Topic Paper (2024, p. 15) emphasizes the importance of preparing these documents concurrently with the Local Plan to prevent delays. The Council is committed to working collaboratively with stakeholders to address detailed design and planning requirements. The Infrastructure Delivery Plan (IDP) outlines the framework for identifying, justifying, and funding infrastructure needs (Enfield Infrastructure Planning). This includes assessing infrastructure costs and ensuring that they are fairly apportioned across sites. The IDP supports the Local Plan by detailing the necessary infrastructure to support new development and ensuring that costs are not disproportionately borne by early-developing sites. While we appreciate Taylor Wimpey's concerns, the Local Plan's approach to housing delivery, Green Belt release, and infrastructure planning is designed to meet the borough's needs effectively and align with national policies. The Plan is supported by robust evidence from the Enfield Infrastructure Planning documents and aligns with strategic objectives to deliver sustainable growth. | No | 01919 | Taylor Wimpey |
| **SA11.1: Land at Crews Hill** | Taylor Wimpey supports the release of Green Belt land for the large-scale new settlement at Site Allocation SA11, which includes approximately 5,500 homes, with 3,350 of these expected within the plan period. They find this approach fully justified based on their detailed representations and the evidence presented elsewhere. | The Local Plan acknowledges the shortfall in housing delivery. The stepped trajectory approach accounts for the phasing of large sites and is intended to align with realistic delivery timescales. This approach is supported by the evidence in the Housing Topic Paper, which includes a detailed assessment of housing needs and delivery constraints. The variation in housing figures reflects the complexities of different planning contexts and stages of planning. The Enfield Housing Topic Paper (2024, Table 4) provides a revised target of approximately 34,280 homes, aligning with a detailed assessment of housing need and supply. This figure takes into account both the immediate and long-term housing requirements and is supported by evidence from the Housing Topic Paper and the Enfield Infrastructure | No | 01919 | Taylor Wimpey |

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| | | Planning evidence base. The justification for Green Belt release is well-documented in the Exceptional Circumstances Topic Paper. The release is necessary to address substantial housing and employment needs, the demand for affordable and family housing, and limitations on urban capacity (Exceptional Circumstances Topic Paper, p. 12). The evidence indicates that relying solely on urban sites would not meet the borough's needs and could impact critical industries in Enfield. The requirement for a masterplan or Supplementary Planning Document (SPD) for strategic areas like Crews Hill ensures comprehensive planning and stakeholder engagement. The Crews Hill Topic Paper (2024, p. 15) emphasizes the importance of preparing these documents concurrently with the Local Plan to prevent delays. The Council is committed to working collaboratively with stakeholders to address detailed design and planning requirements. The Infrastructure Delivery Plan (IDP) outlines the framework for identifying, justifying, and funding infrastructure needs (Enfield Infrastructure Planning). This includes assessing infrastructure costs and ensuring that they are fairly apportioned across sites. The IDP supports the Local Plan by detailing the necessary infrastructure to support new development and ensuring that costs are not disproportionately borne by early-developing sites. While we appreciate Taylor Wimpey's concerns, the Local Plan's approach to housing delivery, Green Belt release, and infrastructure planning is designed to meet the borough's needs effectively and align with national policies. The Plan is supported by robust evidence from the Enfield Infrastructure Planning documents and aligns with strategic objectives to deliver sustainable growth. | | | |
| **SA11.1: Land at Crews Hill** | Taylor Wimpey supports the vision for Crews Hill under Policy PL11, which includes developing around 5,583 new homes and enhancing local services. However, they are concerned about the lack of clear timescales for adopting the Supplementary Planning Document (SPD) and Infrastructure Delivery Plan (IDP), which could lead to delays in delivering the allocated homes and coordinating development across the Crews Hill Placemaking Area. They stress that timely adoption of these documents is crucial to ensure that the development progresses as planned and meets the housing targets within the plan period. | Comments noted. The Council appreciates Taylor Wimpey's support for the vision of Crews Hill as outlined in Policy PL11, including the provision of approximately 5,583 new homes and enhanced local services. The Council acknowledge the concern regarding the timing of the Supplementary Planning Document (SPD) and is committed to expediting the preparation of the SPD to ensure effective coordination of development and timely delivery of infrastructure. The SPD will be prepared alongside the Local Plan process to provide a comprehensive framework for the development, and the IDP will be updated to reflect the latest evidence and requirements. The Council recognizes the importance of these documents in facilitating the successful implementation of the policy, with the aim is to provide certainty for developers and stakeholders and to support the delivery of the planned homes within the anticipated timeframe. | No | 01919 | Taylor Wimpey |
| **SA11.1: Land at Crews Hill** | Taylor Wimpey supports the split of Site Allocation SA11 into separate allocations (1-6) and the associated housing targets and infrastructure requirements. However, they emphasize the need for the Supplementary Planning Document (SPD) and Infrastructure Delivery Plan (IDP) to be available for consultation as part of the Local Plan process. They stress that new local infrastructure must support the new settlement, with contributions proportional to the impact of development. Contributions should be evenly distributed across the Site Allocation rather than disproportionately affecting the initial sites. An IDP should be prepared alongside the Local Plan to ensure infrastructure needs and costs are properly assessed and justified during the Examination in Public. | Comments noted. The Council appreciates Taylor Wimpey's support for the split of the site allocations at Crews Hill as outlined in Policy PL11. The Council acknowledge the concern regarding the timing of the Supplementary Planning Document (SPD) and is committed to expediting the preparation of the SPD to ensure effective coordination of development and timely delivery of infrastructure. The SPD will be prepared alongside the Local Plan process to provide a comprehensive framework for the development, and the IDP will be updated to reflect the latest evidence and requirements. The Council recognizes the importance of these documents in facilitating the successful implementation of the policy, with the aim is to provide certainty for developers and stakeholders and to support the delivery of the planned homes within the anticipated timeframe. | No | 01919 | Taylor Wimpey |
| **SA11.1: Land at Crews Hill** | Rockwell's concerns with Policy PL11 and its associated site allocation SA11.6 center on its current ineffectiveness and the broader implications for delivery and viability. They emphasize their investment in the Enfield Local Plan and support for the Crews Hill allocation but express significant concerns regarding the uncertainty surrounding the development of Kings Oak Equestrian Centre, which hinges on obtaining clarity from the London Borough of Enfield (LBE). They argue for the Green Belt release of parts of Crews Hill due to their previously developed status and low contribution to Green Belt purposes. Additionally, Rockwell highlights challenges related to the local centre's delivery, which depends on LBE's agreement, and the problematic long-term lease on Kings Oak Farm, which impedes financing and timely development. They call for clearer policy guidance | Comments noted. The Council is committed to working collaboratively to develop a Statement of Common Ground (SoCG) to address issues related to site delivery, viability, and the long-term lease on Kings Oak Farm. Additionally, through the Supplementary Planning Document (SPD) process, we will ensure that the coordination of infrastructure and master planning is comprehensive and effective, providing clarity and reassurance on the development framework. Our goal is to resolve outstanding issues and facilitate a smooth and timely delivery of the allocation, in alignment with the overarching vision for Crews Hill. | No | 01932 | Rockwell London Ltd for Kings Oak |

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| | and LBE's commitment to resolve these issues and ensure the site's effective delivery. | | | | |
| **SA11.1: Land at Crews Hill** | Enfield Road Watch raises concerns about the Local Plan regarding Land North of Cattlegate Road, questioning the feasibility and viability of a new road bridge over the railway and arguing that even with bus access, the potential for sustainable transport is poor. They state that existing trees and buffers are inadequate to preserve the countryside setting and that the development would significantly urbanize the countryside. They also note that heritage impacts on the Grade II listed Owls Hall have not been clearly assessed. | Comments noted. The Council has outlined a detailed approach in the Crews Hill Topic Paper to address transport and heritage concerns, including provisions for sustainable transport and careful heritage impact assessments. The spatial framework for Crews Hill is illustrative, providing a flexible guide for development. Additionally, the Integrated Impact Assessment (IIA) supports the viability and feasibility of infrastructure improvements, ensuring thorough evaluation of potential impacts and alignment with strategic goals. The Council has also committed to preparing a Supplementary Planning Document (SPD) for the Crews Hill area to ensure detailed planning and implementation. Further details on viability assessments can be found in the Council's evidence base, which demonstrates the plan's economic soundness and feasibility. | No | 01687 | Enfield Road Watch |
| **SA11.1: Land at Crews Hill** | The Enfield Society is concerned that the proposed 800 homes at the site near Crews Hill will harm the historic and natural landscape. They argue it will suburbanize Owls Hall, a Grade II listed asset, causing substantial harm to its setting. The development breaches the boundary provided by the railway line and extends into open countryside, negatively impacting the scenic quality, tranquillity, and sense of remoteness of Enfield Chase. ENPlan's assessment highlights the significant adverse visual effects and landscape harm this development would cause, suggesting the area should remain undeveloped to preserve its openness. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SA11.2: Land South of Cattlegate Road, Crews Hill** | HCC views the PL11 (SA11.1 – SA 11.6) Crews Hill development as having a slightly negative ecological impact on Hertfordshire, reducing habitat extent and connectivity. The mixed-use area will shift from agriculture, development, and leisure to potentially enhance some ecological features through Biodiversity Net Gain initiatives. Although the current land lacks substantial ecological interest, indirect impacts like increased visitor pressure on local wildlife sites and reserves are uncertain. The extent of these impacts depends on the Green Infrastructure proposals for Crews Hill within Enfield, which are currently unknown. | Comments noted. The Council acknowledge the importance of adhering to national policies and best practices, including the use of up-to-date rainfall data (FEH2022), conservative CV values in drainage calculations, and ensuring developments do not impede upstream catchments or reduce river and flood zone capacity. We will consult with Enfield's Lead Local Flood Authority (LLFA) team and the Environment Agency to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council. | No | 01755 | Hertfordshire County Council - Ecology |
| **SA11.2: Land South of Cattlegate Road, Crews Hill** | TfL recommends that the requirements state any car parking must be minimized and align with the ambition of achieving a 75% sustainable transport mode share, requiring parking levels substantially lower than London Plan maximum standards and considering future rather than existing PTAL. While there is a requirement for a public transport bridge over the railway, the infrastructure requirements should also explicitly call for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough. TfL prefers the wording that development should limit areas within 400 meters of a bus stop, rather than just locating development within 400 meters of a bus stop, as stated in SA11.1. A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that dividing the Crews Hill placemaking area into six separate site allocations could lead to parts being developed before agreeing on the necessary infrastructure requirements and costs for the entire area. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA11.2: Land South of Cattlegate Road, Crews Hill** | Based on available data, the Environment Agency identifies that several sites, including Site SA11.2, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA11.2 specifically be classified within Flood Zone 2 and Flood Zone 3. | The Council welcomes the EA's comments regarding Site SA11.2 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |

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| **SA11.2: Land South of Cattlegate Road, Crews Hill** | The allocation proposes the loss of golf course. This loss would need to be justified in line with NPPF, paragraph 103 which there is currently no mention of the golf club being surplus to requirements or mitigation measures in place to replace the existing golf course. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **SA11.2: Land South of Cattlegate Road, Crews Hill** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA11.2: Land South of Cattlegate Road, Crews Hill** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA11.2: Land South of Cattlegate Road, Crews Hill** | Berkeley Homes (North East London) Ltd supports the allocation of land at Crews Hill for residential-led mixed-use development as outlined in Strategic Policy PL11. They are particularly supportive of the Local Plan's overall vision and the designation of Crews Hill for growth. However, Berkeley suggests modifications to Site Allocation SA11.2 to improve its effectiveness and ensure soundness. They propose increasing the estimated housing capacity for SA11.2 from 200 to approximately 350 homes, considering compensatory measures for the existing SINC and enhanced development potential on adjacent land. Berkeley also recommends including provisions in both Policy SA11.2 and Policy PL11 to address compensatory measures and the broader scope of a comprehensive masterplan, which should encompass retained Green Belt areas beyond the immediate development zone. These modifications aim to provide flexibility and ensure that the plan can accommodate the full potential of the site while addressing ecological and compensatory needs. | The Council acknowledges and appreciates Berkeley's support for the Crews Hill allocation as a sustainable growth area. The Council values Berkeley's detailed analysis and proposed modifications aimed at refining the site's development capacity and addressing ecological considerations. The Council is committed to ensuring that the Local Plan is both robust and responsive to the needs and concerns of stakeholders. In particular, the Council recognizes the importance of addressing the compensatory measures for the SINC and the broader implications for Green Belt land surrounding the Crews Hill Placemaking Area. The Council is committed to collaborating on a Statement of Common Ground (SoCG) with Berkeley Homes and other stakeholders. This will facilitate a shared understanding and agreement on the proposed modifications and the effective implementation of the Local Plan, ensuring it meets both the current and future needs of the Borough while addressing all ecological and planning considerations. | No | 01916 | Berkeley Homes (North East London) Ltd |
| **SA11.2: Land South of Cattlegate Road, Crews Hill** | London Borough of Enfield Strategic Property Services (LBE SPS) supports the spatial vision and strategic objectives of the draft Local Plan, particularly for Crews Hill. They endorse the inclusion of placemaking areas as key components of the spatial strategy and support the vision for CHPA, advocating flexibility to exceed the 5,500 home target as detailed design progresses. They suggest a unified housing figure across documents, recognize the Council's role in collaboration, and emphasize the importance of phased development and ecological protection. They also recommend a flexible masterplan approach to expedite housing delivery and advocate for clear phasing details and viability considerations. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SA11.2: Land South of Cattlegate Road, Crews Hill** | Enfield Road Watch raises concerns about the proposed development on land south of Cattlegate Road, emphasizing the ecological and historical value of Crews Hill Golf Course and King's Oak Plain. They argue that breaching the strong Green Belt boundary is unjustified and would lead to urban sprawl. The designation of Crews Hill Golf Course as a Grade 1 Borough SINC highlights its unique acid grassland habitat, which is irreplaceable. They question the feasibility of development without harming the ecological integrity of the area, citing conflicting expert opinions on ecological impact. | Comments noted. The Council acknowledges the ecological significance of the area but argues that development can be managed sustainably. The spatial framework for Crews Hill is illustrative, allowing for adjustments based on ecological assessments and stakeholder input. Detailed viability assessments and preparation of a Supplementary Planning Document (SPD) for Crews Hill ensure that development plans are realistic and aligned with financial and regulatory frameworks, as outlined in the Chase Park Topic Papers. The Council has extensively engaged with ecological experts to balance development with conservation, ensuring that any development minimizes ecological impact while addressing housing needs. The Site Allocation Topic Paper and the ELP REG19 IIA and Appendices provide comprehensive frameworks to guide sustainable | No | 01687 | Enfield Road Watch |

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| | | development, ensuring that policies are justified and effective in preserving the ecological and historical integrity of the area. | | | |
| **SA11.2: Land South of Cattlegate Road, Crews Hill** | The Enfield Society raises several concerns about the proposed development at Crews Hill. They argue that the area, designated as a Borough Site of Importance for Nature Conservation, includes rare acid grassland habitat, making it unsuitable for development. They highlight that the Green Belt Study indicates 'Very High' harm from releasing this area, despite some suggested mitigations. They emphasize the strategic importance of this land, purchased to be preserved as Green Belt, and reference the NPPF's directive to protect valued landscapes, asserting that development would contradict these guidelines and harm the area's historic and recreational value. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SA11.3: Land South of M25, Crews Hill** | HCC's response specifies that if the site (SA11.3) is designed to drain to Cuffley or Turkey Brook, any discharge must be restricted to greenfield rates and volumes. | Comments noted. The Council will ensure early engagement between Enfield LLFA and developers to address these recommendations. The Council will seek to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and the Environment Agency. | No | 01755 | Hertfordshire County Council as Lead Local Flood Authority (LLFA) |
| **SA11.3: Land South of M25, Crews Hill** | HCC views the PL11 (SA11.1 – SA 11.6) Crews Hill development as having a slightly negative ecological impact on Hertfordshire, reducing habitat extent and connectivity. The mixed-use area will shift from agriculture, development, and leisure to potentially enhance some ecological features through Biodiversity Net Gain initiatives. Although the current land lacks substantial ecological interest, indirect impacts like increased visitor pressure on local wildlife sites and reserves are uncertain. The extent of these impacts depends on the Green Infrastructure proposals for Crews Hill within Enfield, which are currently unknown. | Comments noted. The Council acknowledge the importance of adhering to national policies and best practices, including the use of up-to-date rainfall data (FEH2022), conservative CV values in drainage calculations, and ensuring developments do not impede upstream catchments or reduce river and flood zone capacity. We will consult with Enfield's Lead Local Flood Authority (LLFA) team and the Environment Agency to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council. | No | 01755 | Hertfordshire County Council - Ecology |
| **SA11.3: Land South of M25, Crews Hill** | TfL recommends that the requirements state any car parking must be minimised and align with the ambition of achieving a 75% sustainable transport mode share. This will require parking levels substantially lower than London Plan maximum standards and should consider future rather than existing PTAL. The infrastructure requirements should explicitly call for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough. TfL notes the absence of a reference to development being within 400 meters of a bus stop, which is included in the design principles for SA11.1 and SA11.3. A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that dividing the Crews Hill placemaking area into six separate site allocations could lead to parts being developed before agreeing on the necessary infrastructure requirements and costs for the entire area. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA11.3: Land South of M25, Crews Hill** | Based on available data, the Environment Agency identifies that several sites, including Site SA11.3, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA11.3 specifically be classified within Flood Zone 1. Appendix C (page 449 and 451) state these sites are in flood zones 1-3, the wider PL11 does fall in 1-3, these two allocations are just in FZ1. | The Council welcomes the EA's comments regarding Site SA11.3 and its classification within Flood Zone 1. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **SA11.3: Land South of M25, Crews Hill** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | | | | |
| **SA11.3: Land South of M25, Crews Hill** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA11.3: Land South of M25, Crews Hill** | Glasgow Stud argues that a significant portion of their site is previously developed land, which the NPPF suggests should be prioritized for development. They question the exclusion of their land from the development area despite its potential for use and its existing condition as previously developed land. The Trust contends that the ecological value of their land has been misrepresented. They argue that the site's ecological importance, as assessed by their Preliminary Ecological Appraisal (PEA), is lower than suggested by the LPA. They claim that the site is suitable for development and that the environmental constraints have been overstated. | The Local Plan provides a clear framework for development through the Crews Hill Topic Paper and Site Allocation Topic Paper. Figures 3.13 and 3.14 offer a strategic overview of development areas, while acknowledging that detailed allocations will be further refined through Supplementary Planning Documents (SPDs). This approach aligns with NPPF guidelines, which emphasize the need for policies to be clearly written and unambiguous while allowing for detailed site-specific plans to be developed in subsequent stages. | No | 01869 | The Glasgow Stud |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride supports removing the Crews Hill area, including Homewood Farm, from the Green Belt. They believe this will allow for sustainable development, combining residential and commercial uses. The site is seen as strategically located near Crews Hill station and the M25, making it suitable for development that could provide significant environmental and economic benefits. | Comments noted. The Crews Hill Topic Paper outlines the strategic importance of Crews Hill for meeting Enfield's housing and economic growth targets. It supports the removal of the area from the Green Belt to create a sustainable new community, emphasizing the necessity of balancing development with environmental and infrastructural improvements. Overall, the plan ensures that development in Crews Hill aligns with broader strategic goals, such as enhancing public transport and creating green and blue infrastructure, thereby justifying the removal of Green Belt status. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride raises concerns about the high costs associated with infrastructure requirements, including contributions to new schools, transport links, and other community facilities. They argue that these costs could undermine the economic viability of the proposed developments. | Comments noted. The Enfield Viability Update acknowledges the challenges of high infrastructure costs but maintains that these are necessary for sustainable development. It also emphasizes that the 50% affordable housing target is a strategic goal essential for addressing housing needs in Enfield.<br>The viability assessment in the update shows that while some sites in Crews Hill are "marginal," they remain potentially viable, especially with a phased approach. The Council is committed to flexibility where necessary, but reducing contributions too significantly could undermine the long-term sustainability and infrastructure quality of the new community. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride raises concerns about the challenge of meeting the 50% affordable housing target, given the marginal viability of the Crews Hill site according to the Council's viability assessments. | Comments noted. The Enfield Viability Update acknowledges the challenges of high infrastructure costs but maintains that these are necessary for sustainable development. It also emphasizes that the 50% affordable housing target is a strategic goal essential for addressing housing needs in Enfield.<br>The viability assessment in the update shows that while some sites in Crews Hill are "marginal," they remain potentially viable, especially with a phased approach. The Council is committed to flexibility where necessary, but reducing contributions too significantly could undermine the long-term sustainability and infrastructure quality of the new community. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride recommends a flexible approach to the 50% affordable housing requirement. They suggest this target should be adjusted based on site-specific viability assessments, particularly during the early phases of development. On behalf of their client, they proposes reducing Section 106 (S106) and Community | Comments noted. The Crews Hill Topic Paper supports mixed-use development, including commercial uses where appropriate, but it emphasizes the importance of ensuring that residential and commercial developments are integrated to support community needs and reduce car dependency. The northern part of Homewood Farm, while suited for commercial use due to proximity to the M25, must still align | No | 01881 | Paddington Corporation Limited on behalf of their client at |

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| | Infrastructure Levy (CIL) contributions in the early phases of development to support viability. They suggest considering a phased approach where contributions increase as the site becomes more established and economically viable. They argue that the northern part of Homewood Farm, due to its proximity to the M25 and associated noise, is better suited for commercial and industrial uses rather than residential. This could include light industrial, storage, and distribution facilities, which would also serve as "enabling development" for the relocation of existing businesses within Crews Hill. To enhance the feasibility of the development, the representation suggests re-evaluating the financial contributions required, particularly for school and childcare places, which are currently seen as potentially burdensome. They also propose exploring alternative funding mechanisms or adjusting the CIL rates specifically for the Crews Hill area. | with the broader goals of creating a sustainable, connected community. The plan's mixed-use strategy is designed to ensure balanced development that supports both economic growth and residential quality of life. | | | 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride highlights concerns over the viability of developments in Crews Hill, particularly related to the requirement for a 20% Biodiversity Net Gain (BNG). They argue that this figure, mentioned in Policy PL11 is inconsistent with the viability assumptions in the 2023 Whole Plan Viability Update, which uses a 10% BNG figure. Paddington Corporation Ltd supports the removal of Crews Hill from the Green Belt to create a sustainable community, emphasizing the need for the plan to be "effective" and "deliverable." They suggest amending Policy CR11 to require a minimum of 10% BNG, with flexibility to exceed this where viable. This adjustment would align the policy with the viability assessments and ensure that the development remains financially feasible. They advocate for flexibility in overall development costs, including infrastructure and BNG requirements, to improve the likelihood of developments proceeding in a timely and viable manner. Paddington Corporation Ltd requests to participate in the examination hearing sessions to discuss the benefits of commercial "enabling development" at the Homewood Farm site within the Crews Hill Placemaking Area. | Comments noted. The Viability Update acknowledges challenges in development costs but concludes that the 20% BNG target is achievable with careful planning. It emphasizes that this higher BNG is crucial for meeting sustainability goals in the long term, ensuring that developments contribute positively to the environment. The Crews Hill Topic Paper justifies the council's approach towards the comprehensive development of Crews Hill, including the ambitious 20% BNG target, as part of creating a sustainable, exemplary community. The strategy integrates environmental enhancements with economic viability, ensuring long-term success. The council maintains that the 20% BNG requirement is both feasible and necessary for achieving Enfield's broader sustainability objectives. The Crews Hill development strategy is designed to balance viability with environmental responsibility, ensuring that the area contributes to Enfield's vision of sustainable growth. Flexibility in some aspects may be considered, but reducing the BNG target undermines these essential goals. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride considers the northern part of the Crews Hill site, due to its proximity to the M25, is deemed less suitable for residential use because of noise pollution. However, it is proposed as a viable location for commercial or industrial uses. They suggests using the Homewood Farm site for "enabling development," meaning relocating existing businesses from the central Crews Hill area to this northern site. This relocation would free up central areas for residential development while maintaining local employment opportunities. They suggest amending Policy CR11 to explicitly support large-scale commercial development adjacent to the M25. This would include measures to mitigate noise and protect sensitive uses such as schools and homes.<br>Flexibility for Relocation: It recommends increased flexibility in relocation options for businesses to encourage the release of central sites for residential development within the Crews Hill Placemaking Area (CHPA). Paddington Corporation Ltd requests participation in examination hearings to discuss the benefits of this commercial enabling development at Homewood Farm.<br>Their recommendations aim to align the Local Plan with practical considerations regarding land use and business relocation while ensuring the viability and sustainability of developments in Crews Hill. | Comments noted. The Crews Hill Topic Paper outlines the strategic importance of Crews Hill for sustainable development, balancing residential, commercial, and environmental needs. The area is intended to accommodate new developments while preserving key green spaces and enhancing infrastructure. The spatial framework presented in chapter 3 of the plan, including Figure 3.4, is illustrative. It serves as a guide for potential development patterns but remains flexible to accommodate evolving needs and specific site conditions. This flexibility ensures that the northern part of Crews Hill can be adapted for commercial uses, as suggested by Paddington Corporation Ltd, without deviating from the broader objectives of the Local Plan. The Plan encourages a mix of uses to create a vibrant, sustainable community. The proposed modifications to include commercial uses near the M25 are consistent with the Plan's goals of ensuring viability and supporting local businesses, while also addressing noise and environmental concerns. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride supports the release of Crews Hill from the Green Belt and advocates for commercial development at the northern part of the site near the M25. They believe this area is suitable for light industrial, general industrial, and storage uses, which could enable the relocation of existing businesses from central Crews Hill, freeing up space for residential development. The representation raises concerns about the viability of the proposed developments, particularly due to high costs associated with infrastructure and affordable housing requirements. They emphasize that flexibility in development costs, including Section 106 contributions and Community Infrastructure Levy (CIL) rates, will be crucial to ensuring that the | Comments noted. The Crews Hill Topic Paper outlines a long-term vision for sustainable development in Crews Hill, integrating residential, commercial, and environmental enhancements. This strategy supports the inclusion of commercial development near the M25, as proposed by Paddington Corporation Ltd, to balance economic viability with residential needs. As detailed in Figure 3.4 and relevant sections of the Local Plan, the spatial framework is illustrative, meaning it provides a guiding structure but remains flexible to adapt to site-specific conditions. This flexibility ensures that commercial uses in the northern part of the site can be incorporated effectively, aligning with the broader goals of the Plan. The Local Plan's spatial framework allows for adaptability, ensuring that the | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |

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| | site can be developed successfully. They recommend, amending Site Allocation SA11.3 to explicitly include commercial development in the northern part of the site. They suggest adding 30,000 square meters of commercial capacity, subject to detailed design and capacity considerations. They propose modifying the requirements for infrastructure contributions to make them more flexible, particularly in the early phases of development. This includes potential reductions in Section 106 costs and adjustments to CIL rates to improve viability. They suggests allowing a variety of residential uses, such as care homes, retirement homes, and Build to Rent (BTR) housing, to support overall scheme viability. Paddington Corporation Ltd requests participation in examination hearing sessions to discuss the benefits of commercial "enabling development" at Homewood Farm. | development of Crews Hill can accommodate various land uses while maintaining the Plan's strategic vision. This flexibility justifies the potential for commercial development adjacent to the M25, as it supports the overall viability and sustainability of the Crews Hill area. | | | |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride supports the removal of Crews Hill from the Green Belt to allow for sustainable development, particularly for residential and commercial use.<br>However, they raise concerns about the viability of the proposed development, particularly regarding the affordable housing target and infrastructure contributions, which they argue could hinder development if not made more flexible.<br>They suggest modifying the Site Allocation SA11.3 to allow for more commercial development adjacent to the M25, which they believe would support the relocation of existing businesses and enhance viability. They recommend making infrastructure and affordable housing requirements more flexible, especially in the early stages of development, to ensure that projects remain viable and attractive to developers.<br>In terms of proposing a phased approach to infrastructure contributions, they argue for reducing Section 106 and Community Infrastructure Levy (CIL) rates to support the early phases of development, ensuring that these projects can proceed without financial constraints. Their representation emphasizes the need for pragmatic adjustments to the Local Plan to balance development goals with economic realities, particularly in a challenging area like Crews Hill. | Comments noted. The Plan supports the removal of Crews Hill from the Green Belt for sustainable development, integrating commercial and residential uses while preserving environmental quality. The Site Allocation Topic Paper reinforces this by ensuring the development aligns with Enfield's strategic growth objectives. The Plan already considers the balance between residential and commercial uses, ensuring that the development is viable and contributes to Enfield's broader economic goals. The Viability Update acknowledges the challenges but confirms that the 50% affordable housing target and infrastructure contributions are achievable with phased approaches and flexibility. The Plan's flexibility in adjusting CIL rates and Section 106 contributions ensures that development remains viable, especially in early stages. The Enfield Local Plan's strategies are designed to be flexible and economically viable, supporting both residential and commercial development in Crews Hill while maintaining affordability and infrastructure goals. The proposed adjustments by Paddington Corporation Ltd are already within the scope of the Plan's flexible framework, ensuring the development aligns with Enfield's sustainability and economic objectives. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride supports the principle of Biodiversity Net Gain but raises concerns about the 20% BNG requirement under Policy PL11 arguing that it conflicts with the 10% figure used in the viability assessments. They believe this discrepancy could impact the feasibility of developments.<br>They suggests revising Policy PL11 to require a minimum of 10% BNG, with opportunities to exceed this figure, to align with the viability assessments and ensure the policy is deliverable.<br>They suggest for greater flexibility in overall development costs, including BNG requirements, to improve scheme viability and encourage timely land development. Their recommendations aim to ensure the Local Plan remains viable and effectively deliverable over the plan period. | Comments noted. The Enfield Viability Update acknowledges the importance of balancing environmental goals with development viability. While the update generally supports a 10% BNG as a baseline in the viability assessments, the Local Plan's target of 20% BNG reflects Enfield's broader sustainability ambitions. However, the Plan allows for flexibility through the Viability Tested Route (VTR), where site-specific conditions justify a lower BNG, ensuring that development remains feasible while striving to achieve higher environmental standards where possible. The Local Plan's 20% BNG target is aspirational, aligning with Enfield's sustainability goals, but it includes mechanisms to ensure that development remains viable, reflecting the realities outlined in the Viability Update. This flexible approach allows for adjustments based on specific site conditions, ensuring that both environmental and economic objectives are met. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride considers the northern part of the CHPA, near the M25, is less suitable for residential use due to noise. Instead, it is proposed as a site for commercial or industrial uses, enabling businesses in the central CHPA to relocate, freeing up | Comments noted. The Crews Hill Topic Paper emphasizes a strategic vision for Crews Hill that includes mixed-use development, balancing residential, commercial, and environmental needs. The Site Allocation Topic Paper supports this vision by allowing flexibility in land use to accommodate the area's unique | No | 01881 | Paddington Corporation Limited on behalf of their |

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| | land for residential development.<br>Support for Green Belt Release: Paddington Corporation Ltd supports the release of Crews Hill from the Green Belt to facilitate sustainable community development. They propose to amend Policy PL11 to include support for large-scale commercial development adjacent to the M25 and incorporate mitigation measures for noise impacts from the motorway.<br>They consider the policy should be amended to encourage flexibility in relocation options for businesses to increase the likelihood of land in central Crews Hill being released for residential development. Their overall aim is to ensure the development within Crews Hill is viable and effectively supports both commercial and residential growth. | characteristics. It outlines the need for careful integration of commercial uses, especially in areas like the northern CHPA near the M25, where noise could impact residential viability. The Viability Assessment update addresses the importance of ensuring that development remains economically viable. It supports flexibility in development contributions and infrastructure costs, aligning with the suggestion to include commercial uses that can help subsidize residential developments. The Enfield Local Plan's approach to the CHPA is both flexible and strategic, ensuring that development is economically viable while also meeting the broader goals of sustainable growth. The suggestion to include commercial development near the M25 aligns with the Plan's vision and ensures that noise-sensitive uses are appropriately located. The Plan's flexible approach to viability ensures that contributions and infrastructure costs are adjusted to maintain economic feasibility, supporting the overall sustainability of the Crews Hill area. | | | client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride considers the development of commercial units in the northern part of the Crews Hill area, adjacent to the M25. They believe this area is more suitable for commercial rather than residential use due to noise from the motorway. They are concerned about the financial viability of the planned developments, especially regarding infrastructure contributions, affordable housing, and the costs of development. They recommend modifying the Site Allocation SA11.3 to include at least 30,000 square meters of non-residential capacity (Class E), subject to detailed design and capacity considerations. They suggest making infrastructure contributions and affordable housing requirements more flexible to improve the viability of developments, particularly in the early phases. This includes adjusting Section 106 contributions and Community Infrastructure Levy (CIL) rates.<br>Enablement of Commercial Development: The document advocates for the development of commercial units to enable existing businesses to relocate, which could free up land for residential use in the central Crews Hill area. Paddington Corporation Ltd requests to participate in the examination hearings to discuss the benefits of commercial enabling development at the Homewood Farm site. Their recommendations aim to ensure that the Local Plan remains viable and effective, particularly in the Crews Hill area, by advocating for greater flexibility in policy requirements and a focus on commercial development where appropriate. | Comments noted. The Crews Hill Topic Paper outlines the strategic importance of Crews Hill for sustainable development, balancing residential, commercial, and environmental needs. The area is intended to accommodate new developments while preserving key green spaces and enhancing infrastructure. The spatial framework presented in chapter 3 of the plan, including Figure 3.4, is illustrative. It serves as a guide for potential development patterns but remains flexible to accommodate evolving needs and specific site conditions. This flexibility ensures that the northern part of Crews Hill can be adapted for commercial uses, as suggested by Paddington Corporation Ltd, without deviating from the broader objectives of the Local Plan. The Plan encourages a mix of uses to create a vibrant, sustainable community. The proposed modifications to include commercial uses near the M25 are consistent with the Plan's goals of ensuring viability and supporting local businesses, while also addressing noise and environmental concerns. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride suggests that the northern part of the Crews Hill area, due to its proximity to the M25 and associated noise levels, is more suitable for commercial or industrial development rather than residential use. They express concerns about the financial viability of the development given the infrastructure costs and the 50% affordable housing target. They argue that these requirements may hinder the project's feasibility. They recommend revising the Site Allocation SA11.3 to explicitly include commercial development adjacent to the M25, which would help accommodate businesses relocating from other parts of Crews Hill. They propose adjusting the requirements for infrastructure contributions and affordable housing to make the development more financially viable, particularly in the early stages. They suggests a phased approach to development, allowing for the gradual implementation of infrastructure and contributions to ensure long-term viability. Their recommendations aim to ensure that the Crews Hill development remains economically viable while accommodating necessary commercial and residential growth. | Comments noted. The Crews Hill Topic Paper outlines a comprehensive vision for Crews Hill, balancing residential and commercial development while maintaining environmental integrity. The Plan supports commercial development near the M25, where residential use may be less suitable due to noise, aligning with the suggestion to include commercial uses in the northern part of the site. The Viability Update acknowledges the challenges of high infrastructure costs and affordable housing targets. However, the Plan includes flexibility, allowing for adjustments to contributions and housing targets to ensure that development remains viable. The phased approach to development and contributions is already embedded in the Plan's strategy, ensuring that projects can proceed while maintaining economic feasibility. The Site Allocation Topic Paper supports a mixed-use approach, which includes commercial development where appropriate. The northern part of Crews Hill near the M25 is recognized as suitable for such uses, given the environmental and logistical considerations. The Enfield Local Plan's strategic framework is designed to be flexible and economically viable, supporting both residential and commercial development in Crews Hill. The Plan's approach aligns with Paddington Corporation Ltd's suggestions for commercial development in noise-sensitive areas while ensuring that the overall vision for sustainable growth in Crews Hill is achieved. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |

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| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride highlights that the northern part of the CHPA, near the M25, is less suitable for residential use due to noise. Instead, it proposes using this area for commercial or industrial development, particularly to relocate existing businesses from central Crews Hill. They question the soundness of the plan, particularly regarding its viability and the flexibility needed to ensure that land within the CHPA comes forward for redevelopment. Paddington Corporation Ltd suggests amending Policy CR11 to explicitly support large-scale commercial development near the M25, incorporating measures for noise mitigation and other environmental protections. They recommend allowing greater flexibility in the relocation of businesses to ensure the plan remains viable and that land in the CHPA is effectively redeveloped. | Comments noted. The Crews Hill Topic Paper supports the development of Crews Hill as a mixed-use area, balancing residential and commercial needs. The Site Allocation Topic Paper also allows for flexibility in land use, ensuring that developments are economically viable and meet strategic goals. This document emphasizes the importance of flexibility in land use planning, particularly in areas with specific challenges like proximity to the M25. The Viability Update acknowledges the importance of balancing infrastructure costs and affordable housing targets with the financial realities of development. The Plan's flexibility allows for adjustments in these areas to ensure that projects like those in Crews Hill remain feasible. The Enfield Local Plan's approach is flexible and adaptive, ensuring that developments in Crews Hill can include commercial uses where appropriate, particularly in noise-sensitive areas near the M25. The Plan also includes mechanisms to maintain viability, ensuring that the overall vision for Crews Hill as a sustainable, mixed-use area is achievable. This flexible approach allows for the integration of commercial development, supporting economic growth while addressing site-specific challenges. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride is concerned that the 50% affordable housing requirement might not be viable, especially in the early phases of development in Crews Hill. They argue that the current viability assessment shows that development in this area is marginal. The representation questions the soundness of the plan, emphasizing the need for flexibility in the affordable housing target to ensure the plan is deliverable.<br>They suggest revising Policy H2 to seek 35% affordable housing, with a flexible approach to potentially increase to 50%, depending on the overall viability. They recommend a pragmatic approach to affordable housing and development costs to ensure that land is brought forward for development in a timely manner. | Comments noted. The Enfield Viability Update acknowledges that certain areas, including Crews Hill, present marginal viability. However, it supports the flexibility embedded in the Local Plan, allowing for site-specific viability assessments through the Viability Tested Route (VTR). This approach ensures that while the 50% affordable housing target is aspirational, it can be adjusted based on actual site conditions, ensuring developments remain feasible and aligned with broader housing goals. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | Paddington Corporation Limited on behalf of their client at Homewood Farm, Burnt Farm Ride supports commercial development in the northern part of Crews Hill due to its proximity to the M25, arguing this area is less suitable for residential use. They suggest policy amendments to allow for "enabling development" that relocates existing businesses, freeing up central areas for housing. They also call for flexibility in infrastructure and affordable housing requirements to ensure the area's viability and propose incorporating alternative residential uses to support the plan's overall success. | Comments noted. The Crews Hill Topic Paper outlines the strategic importance of Crews Hill for sustainable development, balancing residential, commercial, and environmental needs. The area is intended to accommodate new developments while preserving key green spaces and enhancing infrastructure. The spatial framework presented in chapter 3 of the plan, including Figure 3.4, is illustrative. It serves as a guide for potential development patterns but remains flexible to accommodate evolving needs and specific site conditions. This flexibility ensures that the northern part of Crews Hill can be adapted for commercial uses, as suggested by Paddington Corporation Ltd, without deviating from the broader objectives of the Local Plan. The Plan encourages a mix of uses to create a vibrant, sustainable community. The proposed modifications to include commercial uses near the M25 are consistent with the Plan's goals of ensuring viability and supporting local businesses, while also addressing noise and environmental concerns. | No | 01881 | Paddington Corporation Limited on behalf of their client at 'Homewood Farm, Burnt Farm Ride, Enfield, EN2 9DY' |
| **SA11.3: Land South of M25, Crews Hill** | The site is located within Site Allocation SA11.3 'Land South of M25, Crews Hill,' is highlighted for its potential to support both residential and commercial development. The Draft ELP indicates a requirement for approximately 700 new homes, with significant public open space and community facilities. However, the current site allocation does not specify non-residential capacity. Given Homewood Farm's location near the M25, it is proposed that the allocation include a minimum of 30,000 sq. m of commercial space to accommodate businesses relocating within the CHPA. The '2023 Whole Plan – Viability Update' identifies development at Crews Hill as marginal, influenced by high costs and low residual values. The report suggests flexibility in affordable housing and contributions to improve viability. It is recommended that the Site Allocation include provisions for reduced S.106 costs, potential CIL adjustments, and flexible affordable housing targets. Additionally, updates to the site's infrastructure requirements and design principles are suggested, including incorporating commercial development to support local | Comments noted. The recent 'Enfield Viability Update' confirms that while current development at Crews Hill is assessed as "marginal" with residual values below the benchmark land value, this does not negate the potential to achieve high affordable housing targets over time. The Update underscores that development viability is influenced by factors such as market conditions and strategic planning adjustments. Despite the current challenges, the Council is committed to aligning affordable housing targets with both present and future market conditions. The 50% target is aspirational, aimed at driving high standards where feasible, with the Council adopting a pragmatic approach in the initial phases to allow flexibility in affordable housing delivery. This approach will enable gradual progress towards the higher targets as conditions improve. The SPD will be crucial in addressing site-specific challenges, including additional financial contributions and land remediation costs, ensuring that the planning framework supports sustainable development while being responsive to viability concerns. | No | 02001 | Tile Kiln Farm |

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| | businesses and varying residential models to enhance viability. The Homewood Farm site is considered a key opportunity for enabling development, potentially increasing the residential capacity from the current estimate of 280 homes. | | | | |
| **SA11.3: Land South of M25, Crews Hill** | Enfield Road Watch's response to the local plan for Land South of M25 raises concerns about the proposed 440 new homes likely to be occupied before the Local Centre is established, fostering car-dependency and conflicting with the London Plan's objectives. They question the feasibility and scale of the Local Centre, which may be insufficient for 5,500 homes. The Enfield Characterisation Study highlights the area as part of the historic Theobalds Estate and a "valuable green gateway," deeming it unsuitable for development. | Comments noted. The Crews Hill Topic Paper and Integrated Impact Assessment (IIA) outline plans to ensure phased development with infrastructure and Local Centre delivery, addressing concerns of car-dependency. The historic significance and environmental factors have been considered, with plans to incorporate green spaces to maintain the character of the Theobalds Estate. Additionally, the Infrastructure Delivery Plan supports sustainable transport and local services to align with strategic objectives. | No | 01687 | Enfield Road Watch |
| **SA11.3: Land South of M25, Crews Hill** | The Enfield Society's concerns regarding the development at Crews Hill focus on the impact on the Grade II* listed building, The Paddocks, and its associated barns. Their Heritage Impact Assessment (HIA) indicates that the development would sever The Paddocks from its historical agricultural landscape, causing substantial harm to its setting and significance. The proposed new road and housing would erode the remnants of Theobalds Park, negatively impacting the legibility and understanding of the farmstead. This conflicts with Local Plan policies and NPPF paragraph 206, which requires clear justification for any harm to heritage assets. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SA11.4: Land North and South of Cattlegate Road** | HCC views the PL11 (SA11.1 – SA 11.6) Crews Hill development as having a slightly negative ecological impact on Hertfordshire, reducing habitat extent and connectivity. The mixed-use area will shift from agriculture, development, and leisure to potentially enhance some ecological features through Biodiversity Net Gain initiatives. Although the current land lacks substantial ecological interest, indirect impacts like increased visitor pressure on local wildlife sites and reserves are uncertain. The extent of these impacts depends on the Green Infrastructure proposals for Crews Hill within Enfield, which are currently unknown. | Comments noted. The Council acknowledge the importance of adhering to national policies and best practices, including the use of up-to-date rainfall data (FEH2022), conservative CV values in drainage calculations, and ensuring developments do not impede upstream catchments or reduce river and flood zone capacity. We will consult with Enfield's Lead Local Flood Authority (LLFA) team and the Environment Agency to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council. | No | 01755 | Hertfordshire County Council - Ecology |
| **SA11.4: Land North and South of Cattlegate Road** | TfL recommends that the requirements state any car parking must be minimized and consistent with the ambition of achieving a 75% sustainable transport mode share. This will necessitate parking levels substantially lower than London Plan maximum standards and should consider future rather than existing PTAL. The infrastructure requirements should explicitly call for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough. TfL notes the absence of a reference to development being within 400 meters of a bus stop, which is included in the design principles for SA11.1 and SA11.3. A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that dividing the Crews Hill placemaking area into six separate site allocations could result in parts being developed before agreeing on the necessary infrastructure requirements and costs for the entire area. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA11.4: Land North and South of Cattlegate Road** | Based on available data, the Environment Agency identifies that several sites, including Site SA11.4, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA11.4 specifically be classified within Flood Zone 1. Appendix C (page 449 and 451) state these sites are in flood zones 1-3, the wider PL11 does fall in 1-3, these two allocations are just in FZ1. | The Council welcomes the EA's comments regarding Site SA11.3 and its classification within Flood Zone 1. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |

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| **SA11.4: Land North and South of Cattlegate Road** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA11.4: Land North and South of Cattlegate Road** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA11.4: Land North and South of Cattlegate Road** | Berkeley Homes (North East London) Ltd supports the allocation of land at Crews Hill for a residential-led mixed-use development under Strategic Policy PL11. Berkeley owns land parcels within the area and is fully in favor of the Local Plan's goals for Crews Hill, including its potential to develop a new, sustainable settlement around the under-utilized train station. 1) Support for Allocation: Berkeley agrees with the allocation of Crews Hill and acknowledges the exceptional circumstances justifying its removal from the Green Belt for development. The land is seen as suitable, available, and achievable for residential-led development. 2) Site Allocation SA11.4: Berkeley supports the inclusion of the site known as Enfield Garden Centre (formerly Wyevale Garden Centre) within the Crews Hill Placemaking Area. The site is well-suited for development, being previously developed land with minimal constraints. While Berkeley supports the general principles of the SA11.4 site allocation policy, it suggests some specific modifications to enhance the policy's effectiveness and ensure soundness.<br>Modifications Suggested: 1) Primary School Location: Berkeley proposes flexibility in the policy regarding the location of a primary school. They suggest that the Enfield Garden Centre site could potentially host the primary school, depending on the comprehensive masterplanning stage. The policy should allow for this possibility by reflecting it in the masterplan requirements. 2) Infrastructure Requirements: Berkeley recommends updating Policy SA11.4 to include the potential for the primary school to be located within this site if future planning indicates it is a suitable location. The policy should thus be adjusted to provide for this flexibility. In summary, Berkeley Homes supports the Crews Hill allocation but advocates for specific amendments to the policy to better accommodate potential uses and infrastructure needs identified during future masterplanning. | The Council welcome Berkeley's endorsement of the Local Plan's objectives and their positive assessment of the potential for this new sustainable settlement centered around the existing train station. The Council appreciates their feedback on Site Allocation SA11.4, including the Enfield Garden Centre site, and Berkeley's support for the general allocation policy. The Council understand the site's suitability for development based on its existing use and characteristics. The Council acknowledge Berkeley's suggestion regarding the potential location of a primary school at the Enfield Garden Centre site. The support for the allocation is welcomed, and that work on the spatial frameworks has sought to identify suitable locations for essential infrastructure, including primary schools. However, the comprehensive masterplanning process will further refine these locations. The Council believes that the policy as currently drafted provides sufficient flexibility for the location of the primary school to be adjusted based on future masterplanning outcomes. Therefore, we do not consider the suggested modification necessary to make the plan sound. Berkeley's input on infrastructure requirements is valuable. The Council agree that the policy should be adaptable to align with the outcomes of the masterplanning process. The Council will ensure that the policy accommodates the flexibility needed for effective infrastructure delivery as part of the comprehensive masterplan. The Council remains committed to collaborating with stakeholders, including Berkeley Homes, to refine policies and ensure they are both sound and deliverable. The forthcoming masterplanning and SPD processes will provide further opportunities to address detailed site-specific needs and infrastructure considerations. | No | 01916 | Berkeley Homes (North East London) Ltd |
| **SA11.4: Land North and South of Cattlegate Road** | Warmerdam & Co (Crews Hill) Ltd argues that Policy PL11's current requirements for Crews Hill may undermine development viability due to high Section 106 and CIL costs, which, combined with the area's marginal viability as indicated in the '2023 Whole Plan – Viability Update,' could hinder the project's feasibility. They propose adjustments such as reducing S.106 contributions, implementing a more flexible CIL rate, allowing some flexibility in affordable housing percentages, and incorporating alternative residential uses like care homes and Build to Rent (BTR) to enhance viability. They recommend updating policy points to reflect these changes while supporting the long-term vision of a sustainable Crews Hill community. | Comments noted. The '2023 Whole Plan – Viability Update' provides the justification that greenfield sites, particularly those in higher value areas of the Borough, have a higher capacity to support substantial levels of affordable housing. The report highlights that these sites can feasibly accommodate up to 50% affordable housing due to their generally higher residual values compared to urban sites. The data suggests that, despite the marginal viability currently observed at Crews Hill, greenfield sites in high-value areas have the potential to achieve and even exceed the 50% affordable housing target as market conditions improve. The report recognizes that viability assessments are sensitive to market conditions, which can evolve. The anticipated improvement in market conditions over time could enhance the financial viability of development projects, including the ability to meet the 50% affordable housing requirement. Therefore, the current 'amber' classification should be viewed as a starting point, with the expectation that future adjustments and market improvements will support the achievement of higher affordable housing targets. Policy H2 includes provisions for the Viability Tested Route (VTR) for developments that cannot immediately meet the 50% | No | 01730 | Warmerdam & Co (Crews Hill) Ltd |

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| | | affordable housing requirement. This approach ensures that while the policy sets an ambitious target, there is flexibility built into the system to accommodate site-specific viability issues. This pragmatic approach allows developers to provide evidence of viability challenges and negotiate appropriate affordable housing levels based on realistic assessments. While acknowledging the concerns about development costs such as Section 106 contributions, CIL rates, and land remediation, the viability update stresses that these factors are incorporated into the overall assessment framework. The report's findings are based on a holistic view of development costs and values. Therefore, the viability framework already accounts for these costs and demonstrates that greenfield sites, including Crews Hill, are expected to support higher levels of affordable housing despite these expenses. While Warmerden & Co raises valid points regarding the current marginal viability of Crews Hill, the '2023 Whole Plan – Viability Update' provides a strong basis for maintaining the 50% affordable housing target. The update supports the feasibility of high affordable housing levels on greenfield sites and anticipates improvements in viability over time. The flexibility provided by the Viability Tested Route ensures that the policy remains adaptable to site-specific conditions. Therefore, maintaining the 50% affordable housing requirement aligns with the long-term goals of the Local Plan and supports the creation of a sustainable and inclusive community at Crews Hill. | | | |
| **SA11.4: Land North and South of Cattlegate Road** | Enfield Road Watch's response to the local plan for Land North and South of Cattlegate Road raises concerns about the feasibility and effectiveness of the proposal for 2,250 new homes and a new Local Centre. They argue that the policy is unlikely to be effective due to the lack of landowner cooperation and unclear financial resources for land acquisition or compulsory purchase orders (CPO). The response highlights the risk of piecemeal development due to vague phasing timeframes and insufficient clarity on deliverable sites. Concerns are also raised about ecological impacts on the Glasgow Stud SINC and potential disruption to local businesses. | Comments noted. Enfield Road Watch's concerns about the feasibility and ecological impacts of the Crews Hill development are acknowledged. However, the spatial framework for Crews Hill is illustrative, allowing flexibility to address these concerns. The viability assessment and preparation of an SPD ensure that the development is realistic within financial constraints, mitigating risks related to land acquisition and phasing. The ELP REG19 IIA and appendices address ecological impacts, ensuring wildlife habitat protection. Extensive consultations and cooperation align the plan with regional goals, making the development feasible, sustainable, and compliant with planning policies. | No | 01687 | Enfield Road Watch |
| **SA11.4: Land North and South of Cattlegate Road** | The Enfield Society's concerns about the land north and south of Cattlegate Road in Crews Hill include potential delays in delivering the Local Centre, which could increase car-based trips and affect rural lanes. They question the effectiveness of a comprehensive masterplanned approach due to the complexity and number of landowners. They also highlight the visual impact of taller buildings and the intrusion into views from The Ridgeway. Furthermore, the necessity for exceptional circumstances to introduce new development in the Greenbelt area is emphasized, with a suggestion to consider the vacant site adjacent to the Plough Public House. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | HCC's response highlights that the site (SA11.5) contains areas of Cuffley Brook, and any discharge must be restricted to greenfield rates and volumes. The site also includes areas within Flood Zone 2 and 3, and HCC recommends consulting the Environment Agency on any proposals for this site. | Comments noted. The Council will ensure early engagement between Enfield LLFA and developers to address these recommendations. The Council will seek to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and the Environment Agency. | Yes | 01755 | Hertfordshire County Council as Lead Local Flood Authority (LLFA) |
| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | HCC views the PL11 (SA11.1 – SA 11.6) Crews Hill development as having a slightly negative ecological impact on Hertfordshire, reducing habitat extent and connectivity. The mixed-use area will shift from agriculture, development, and leisure to potentially enhance some ecological features through Biodiversity Net Gain initiatives. Although the current land lacks substantial ecological interest, indirect impacts like increased visitor pressure on local wildlife sites and reserves are uncertain. The extent of these impacts depends on the Green Infrastructure proposals for Crews Hill within Enfield, which are currently unknown. | Comments noted. The Council acknowledge the importance of adhering to national policies and best practices, including the use of up-to-date rainfall data (FEH2022), conservative CV values in drainage calculations, and ensuring developments do not impede upstream catchments or reduce river and flood zone capacity. We will consult with Enfield's Lead Local Flood Authority (LLFA) team and the Environment Agency to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council. | No | 01755 | Hertfordshire County Council - Ecology |

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| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | TfL recommends that the requirements state any car parking must be minimized and consistent with the ambition of achieving a 75% sustainable transport mode share. This will necessitate parking levels substantially lower than London Plan maximum standards and should consider future rather than existing PTAL. The infrastructure requirements should explicitly call for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough. TfL notes the absence of a reference to development being within 400 meters of a bus stop, which is included in the design principles for SA11.1 and SA11.3. A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that dividing the Crews Hill placemaking area into six separate site allocations could result in parts being developed before agreeing on the necessary infrastructure requirements and costs for the entire area. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | Based on available data, the Environment Agency identifies that several sites, including Site SA11.5, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA11.5 specifically be classified within Flood Zone 2 and Flood Zone 3. | The Council welcomes the EA's comments regarding Site SA11.5 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | GF Planning, on behalf of their client confirms the landowners are working together and confirms that the sites are suitable (SA11.5: Land East of Theobalds Road Park, Crews Hill and SA11.4: Land North and South of Cattlegate Road). | Comments noted. | No | 00014 | Gfplanning Limited. |
| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | GF Planning, on behalf of their client confirms the landowners are working together and confirms that the sites are suitable (SA11.5: Land East of Theobalds Road Park, Crews Hill and SA11.4: Land North and South of Cattlegate Road). | Comments noted. | No | 00014 | Gfplanning Limited. |
| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water’s website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | Glasgow Stud's concerns highlight several potential issues with the Local Plan’s adherence to the National Planning Policy Framework (NPPF), particularly regarding the clarity and effectiveness of policies and the overall strategy for development. The Local Plan, as represented in figures 3.13 and 3.14, shows broad areas for development without detailed, specific allocations. This vagueness conflicts with NPPF requirements for clear, unambiguous policies. The site | The Local Plan provides a clear framework for development through the Crews Hill Topic Paper and Site Allocation Topic Paper. Figures 3.13 and 3.14 offer a strategic overview of development areas, while acknowledging that detailed allocations will be further refined through Supplementary Planning Documents (SPDs). This approach aligns with NPPF guidelines, which emphasize the need for | No | 01869 | The Glasgow Stud |

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| | allocation maps and the unclear status of "white land" and other areas potentially compromise the plan's effectiveness and transparency. Glasgow Stud's land is significantly impacted by the current proposals. The Regulation 19 Plan labels large portions of their land as part of "Whitewebbs Park," which the Trust believes may be an error. The proposed access routes and their safety are also questioned, indicating a lack of thorough engagement with site-specific details and concerns. | policies to be clearly written and unambiguous while allowing for detailed site-specific plans to be developed in subsequent stages. | | | |
| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | Glasgow Stud argues that a significant portion of their site is previously developed land, which the NPPF suggests should be prioritized for development. They question the exclusion of their land from the development area despite its potential for use and its existing condition as previously developed land. The Trust contends that the ecological value of their land has been misrepresented. They argue that the site's ecological importance, as assessed by their Preliminary Ecological Appraisal (PEA), is lower than suggested by the LPA. They claim that the site is suitable for development and that the environmental constraints have been overstated. | The Local Plan provides a clear framework for development through the Crews Hill Topic Paper and Site Allocation Topic Paper. Figures 3.13 and 3.14 offer a strategic overview of development areas, while acknowledging that detailed allocations will be further refined through Supplementary Planning Documents (SPDs). This approach aligns with NPPF guidelines, which emphasize the need for policies to be clearly written and unambiguous while allowing for detailed site-specific plans to be developed in subsequent stages. | No | 01869 | The Glasgow Stud |
| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | Enfield Road Watch's response to the local plan for the "Land East of Theobalds Park Road" raises several issues. They argue that the proposed 550 new homes are not justified given the identified land area, which could only support a fraction of the housing target. Concerns about the inclusion of a secondary school and the unclear intentions of various landowners add to doubts about the plan's feasibility. The creation of a new public park along Cuffley Brook and an improved setting for Whitewebbs Museum of Transport are questioned due to uncertainties around landownership and practical implementation. | Comments noted. The Council assets that the development plans are both feasible and aligned with strategic goals, ensuring sustainable and well-planned growth for the area. The housing targets have been carefully assessed, taking into account potential densities and land availability. The Council has considered different density scenarios and concluded that the proposed number of homes is achievable, this is set out in the Chase Park Topic Paper. The infrastructure planning process includes provisions for educational facilities to meet future demands. The secondary school has been strategically included to ensure comprehensive educational coverage for new and existing residents. The Council is actively engaging with landowners and has mechanisms in place to facilitate cooperation and land assembly, including the potential use of Compulsory Purchase Orders (CPO) if necessary. The creation of a new public park along Cuffley Brook and the improvement of the setting for Whitewebbs Museum are integral parts of the plan, ensuring enhanced green spaces and cultural heritage preservation. The Council has plans to work closely with landowners and stakeholders to ensure these enhancements are realized effectively. | No | 01687 | Enfield Road Watch |
| **SA11.5: Land East of Theobalds Road Park, Crews Hill** | The Enfield Society's concerns regarding the land east of Theobalds Park Road include potential significant harm to the Glasgow Stud SINC due to unclear development limits, lack of clarity on new green spaces, and potential ineffectiveness due to uncertain landowner intentions. While the creation of a new park near the Whitewebbs Transport Museum is supported, residential development could harm the rural character of Whitewebbs Road. Development should avoid the SINC to maintain ecological integrity, and more detailed plans are needed for clear decision-making. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SA11.6:Land South West of Theobalds Park Road** | HCC views the PL11 (SA11.1 – SA 11.6) Crews Hill development as having a slightly negative ecological impact on Hertfordshire, reducing habitat extent and connectivity. The mixed-use area will shift from agriculture, development, and leisure to potentially enhance some ecological features through Biodiversity Net Gain initiatives. Although the current land lacks substantial ecological interest, indirect impacts like increased visitor pressure on local wildlife sites and reserves are uncertain. The extent of these impacts depends on the Green Infrastructure proposals for Crews Hill within Enfield, which are currently unknown. | Comments noted. The Council acknowledge the importance of adhering to national policies and best practices, including the use of up-to-date rainfall data (FEH2022), conservative CV values in drainage calculations, and ensuring developments do not impede upstream catchments or reduce river and flood zone capacity. We will consult with Enfield's Lead Local Flood Authority (LLFA) team and the Environment Agency to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council. | No | 01755 | Hertfordshire County Council - Ecology |
| **SA11.6:Land South West of Theobalds Park Road** | TfL recommends that the requirements state any car parking must be minimised and consistent with the ambition of achieving a 75% sustainable transport mode share. This will necessitate parking levels substantially lower than London Plan maximum standards and should consider future rather than existing PTAL. While there is a requirement for a public transport bridge over the railway, the | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| | infrastructure requirements should also explicitly call for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough. TfL notes the absence of a reference to development being within 400 meters of a bus stop, which is included in the design principles for SA11.1 and SA11.3. A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that dividing the Crews Hill placemaking area into six separate site allocations could lead to parts being developed before agreeing on the necessary infrastructure requirements and costs for the entire area. | | | | |
| **SA11.6:Land South West of Theobalds Park Road** | Based on available data, the Environment Agency identifies that several sites, including Site SA11.6, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA11.6 specifically be classified within Flood Zone 2 and Flood Zone 3. | The Council welcomes the EA's comments regarding Site SA11.6 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **SA11.6:Land South West of Theobalds Park Road** | Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water’s website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA11.6:Land South West of Theobalds Park Road** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA11.6:Land South West of Theobalds Park Road** | London Borough of Enfield Strategic Property Services (LBE SPS) supports the inclusion of Kings Oak Equestrian Centre in the CHPA for future development, recognizing its strategic location and potential to deliver new homes. They recommend its development in the early years of the plan period, suggesting a capacity of around 330 new homes based on a density of 75 dph. They emphasize the site's alignment with the Council’s vision and objectives, and the justification for its release from the Green Belt under exceptional circumstances. Detailed design work will determine the final development quantum. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SA11.6:Land South West of Theobalds Park Road** | London Borough of Enfield Strategic Property Services (LBE SPS) highlights the potential of Sunbeam Stud for development within the CHPA, emphasizing its logical location and ability to contribute to Enfield's strategic objectives. They note the site’s omission from the phasing and density plans and recommend its inclusion to optimize housing delivery. LBE suggests the site, which is 7.38 hectares, could support around 369 new homes at a density of 50 dph. They advocate for early development within the plan period and seek a more detailed breakdown of the expected development from the Council. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SA11.6:Land South West of Theobalds Park Road** | Enfield Road Watch's response to the local plan for the "Land southwest of Theobalds Park Road" raises several issues. They argue that Design Principles D and E are ineffective due to unclear landowner incentives for creating new public parks and habitats. The proposed 1,000 new homes are not justified, with calculations showing the identified land supports far fewer homes, raising | Comments noted. The concerns about the effectiveness of Design Principles D and E are acknowledged. The Council plans to use its strategic planning powers, including potential Compulsory Purchase Orders (CPOs), to facilitate land assembly and development as outlined in the Chase Park Topic Paper 2024. The feasibility and viability of housing targets have been carefully assessed, as set out | No | 01687 | Enfield Road Watch |

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| | concerns about urbanization impacts on the London LOOP footpath and Clay Hill Conservation Area. They also highlight potential car dependency due to early housing development ahead of the Local Centre. | in the Site Allocation Topic Paper and Enfield Housing Topic Paper 2024, ensuring that proposed densities are appropriate for the context and landscape. Concerns about urbanization and ecological impacts are addressed through stringent planning measures. The spatial framework is illustrative, providing flexibility in development plans to preserve the area's character while meeting housing needs. The Council is committed to aligning development with regional transport strategies to reduce car dependency, supported by extensive consultations and cooperation with stakeholders, as set out in the ELP Spatial Strategy and Overall Approach Topic Paper. The preparation of a Supplementary Planning Document (SPD) for the Crews Hill area will ensure detailed planning and effective implementation of development plans. | | | |
| **SA11.6:Land South West of Theobalds Park Road** | The Enfield Society's concerns about the land southwest of Theobalds Park Road include the unclear designation of the Clay Hill Conservation Area in planning maps, with potential removal from the Green Belt. They worry about the proposed development's impact on the rural character of Wildwoods and Flash Lane. Additionally, they fear urbanization along Strayfield Road, which could harm the attractive rural character of the London LOOP and Hertfordshire Chain Walk paths. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **URB.01: Land known as Brimsdown Sports Ground** | TfL welcomes the requirement that development should minimise parking. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.01: Land known as Brimsdown Sports Ground** | Based on available data, the Environment Agency identifies that several sites, including Site URB.01, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site URB.01 specifically be classified within Flood Zone 2. Appendix C (page 457) states this site is in FZ1, this is incorrect, there is marginal FZ2. | The Council welcomes the EA's comments regarding Site URB.01 and its classification within Flood Zone 1. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **URB.01: Land known as Brimsdown Sports Ground** | The Environment Agency notes that development on historic landfills, such as Site URB.01: Land known as Brimsdown Sports Ground, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **URB.01: Land known as Brimsdown Sports Ground** | The allocation suggests that there could potentially be the loss of playing field land and associated facilities. The 2018 PPS clearly states on page 72 that these playing pitches should be reinstated as there is a strategic need for this space in order to meet existing demand. This site allocation currently does not meet with paragraph 103 of the NPPF or Sport England Playing Field policy. In order to meet with policy, the allocation would have to meet with one of three of the exceptions in paragraph 103 of the NPPF. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **URB.01: Land known as Brimsdown Sports Ground** | For site URB.01, Thames Water indicates that the scale of development in this catchment will likely necessitate upgrades to the water supply network infrastructure. They recommend that developers and the Local Planning Authority engage with Thames Water early to create a housing phasing plan. Failure to do so may result in planning conditions to manage development phasing and ensure | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | necessary infrastructure upgrades are completed before occupancy. Developers can find information on network infrastructure at the Thames Water website. | | | | |
| **URB.01: Land known as Brimsdown Sports Ground** | For site URB.01, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.01: Land known as Brimsdown Sports Ground** | LBESPS supports the allocation of Brimsdown Sports Ground (SA URB.01) for renewed community uses and residential development. They endorse contributing towards improvements at Brimsdown Station and the provision of a mix of residential typologies, subject to detailed design and discussions with Sport England. The estimated capacity of 225 new homes and a development timeframe of up to 10 years are supported. They highlight the site's sustainability and deliverability, prioritizing it for development. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **URB.02: Cockfosters Station Car Park** | Historic England recommends enhancing the design principles for heritage-sensitive areas, clarifying GLAAS consultation requirements, and providing explanations of the colour coding in the heritage considerations boxes where relevant. For Policy URB.02, they suggest amending bullet point I by adding the following: "… and should demonstrate how the development has responded to and taken into account the significance of the listed tube station." | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **URB.02: Cockfosters Station Car Park** | TfL welcomes the requirement for contributions towards identified upgrades to the London Underground network but notes it should refer to Cockfosters rather than Arnos Grove. Since step-free access is already provided at Cockfosters, contributions should focus on general station access or capacity improvements, including streetscape improvements and better crossing facilities to enhance accessibility and safety. TfL also welcomes the requirement for car-free development but recommends amending the wording to state it "must deliver car-free development" to ensure consistency with the London Plan, considering the PTAL of 6a. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.02: Cockfosters Station Car Park** | For site URB.02, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.02: Cockfosters Station Car Park** | Places for London welcome Enfield's inclusion of a 351 Approximate Estimated Housing Capacity for the Cockfosters Station Car Park allocation. However, they strongly suggest that this is approximate capacity is amended to '350-400', which will present a greater degree of flexibility in light of recent changes to building regulations and requirement to provide a second staircase in buildings of 18 metres or more. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **URB.03: Former Chase Farm Hospital** | TfL welcomes the requirement that development should minimize residential parking. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.03: Former** | For site URB.03, Thames Water recommends that developers and the Local Planning Authority liaise with them early to agree on a housing phasing plan for developments in the catchment area. This is to ensure that water supply network | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades | Yes | 01681 | Thames Water |

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| **Chase Farm Hospital** | infrastructure upgrades are completed before the occupation of new developments. Without early coordination, planning conditions may be imposed to control the phasing of development to prevent outpacing the delivery of essential upgrades. Developers can request information on network infrastructure through the Thames Water website: Thames Water Planning Your Development. | are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with Thames Water to support responsible development and maintain essential services. | | | |
| **URB.03: Former Chase Farm Hospital** | For site URB.03, Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with Thames Water to support responsible development and maintain essential services. | Yes | 01681 | Thames Water |
| **URB.03: Former Chase Farm Hospital** | Residents are concerned that the development proposed under URB.03 for the Former Chase Farm Hospital site will exacerbate existing issues related to car dominance, with insufficient infrastructure to accommodate the increased traffic. | Comments noted. The Spatial Strategy and Overall Approach Topic Paper outlines that any development must include a detailed traffic impact assessment to manage and mitigate increased car usage effectively. This includes integrating transportation planning with public transit improvements to reduce car dependency. The Site Allocation Topic Paper mandates that developments include provisions for expanding and upgrading local infrastructure, such as schools and healthcare facilities, to ensure they can accommodate the increased population without compromising service quality. Additionally, the plan emphasizes the creation of local employment opportunities as part of the redevelopment, aiming to reduce the need for residents to travel long distances for work. The Local Plan aims to balance development needs with the preservation of community services and the overall quality of life. | No | 01759 | Friends of Enfield Chase |
| **URB.03: Former Chase Farm Hospital** | The Enfield Society's concerns include the omission of four Local Heritage Assets within the site boundary from the design principles, making the policy inconsistent with national historic environment policy. Despite potential residential developments that could fund repairs, these heritage assets remain neglected and are now 'at risk.' The Clock Tower, a notable landmark, symbolizes the area's historical significance in poor relief and medical care. The lack of focus on these assets undermines the character and identity of this part of Enfield. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **URB.04: Blackhorse Tower, Cockfosters Road** | TfL welcomes the requirement for contributions towards identified upgrades to the London Underground network but notes it should refer to Cockfosters rather than Arnos Grove. Since step-free access is already provided at Cockfosters, contributions should focus on general station access or capacity improvements, including streetscape improvements and better crossing facilities to enhance accessibility and safety for station users. TfL also welcomes the requirement for car-free development. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.04: Blackhorse Tower, Cockfosters Road** | For site URB.04, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **URB.05: New Avenue Estate** | For site URB.05, Thames Water states that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. They recommend early liaison between the developer, the Local Planning Authority, and Thames Water to agree on a housing phasing plan. This will ensure that necessary infrastructure upgrades are delivered ahead of development occupation, preventing the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.05: New Avenue Estate** | For site URB.05, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.05: New Avenue Estate** | Vistry Group supports the draft site allocation for the New Avenue Estate (SA URB.05) but requests amendments to better reflect existing planning permissions. They propose updating the housing capacity to 502 homes, adjusting the delivery timeframe, and modifying footnote 14 to reference extant planning permission (20/00037/VAR). Additionally, they suggest revising design principles to allow for sensitively located tall buildings, as the site already has permission for buildings up to nine storeys. They also request inclusion of the site in the draft Tall Building Maps in Appendix C. | The council appreciates Vistry Group's support and acknowledges the concerns regarding the wording of policy SA URB.05. The Council will continue to engage with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01897 | Vistry Group |
| **URB.06: Former Middlesex University, Trent Park** | Historic England recommends that Policy URB.06 be revised to include a comprehensive reference to all designated heritage assets within the boundary, along with clear guidance on how the heritage significance of each asset must be carefully considered and respected in the development of any proposals. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |
| **URB.06: Former Middlesex University, Trent Park** | For site URB.06, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.07: Sainsburys, Green Lanes** | TfL welcomes the requirement that development should minimise parking. This requirement should apply to all proposed uses, including residential, commercial, and the re-provision of the retail store. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.07: Sainsburys, Green Lanes** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site URB.07: Sainsburys, Green Lanes as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site URB.07 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including URB.07, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |

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| **URB.07: Sainsburys, Green Lanes** | For site URB.07, Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.07: Sainsburys, Green Lanes** | For site URB.07, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.07: Sainsburys, Green Lanes** | For site URB.07, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.07: Sainsburys, Green Lanes** | The Enfield Conservative Group opposes the proposed redevelopment of the Sainsbury's site on Green Lanes, arguing that the scale and massing of the new development would be inconsistent with the surrounding two-story dwellings. They are concerned that the loss of parking would harm the viability of the supermarket, a key community asset, and would lead to traffic displacement onto already congested routes in the area. Additionally, they believe the redevelopment would damage the character and visual amenity of the surrounding green space, resulting in overdevelopment that is out of character with the existing housing. The Conservative Group recommends deleting the proposals for Sainsbury's Green Lanes redevelopment (SA URB.07) from the Local Plan to preserve the character of Winchmore Hill and protect vital community amenities. They suggest revisiting the policies on housing to ensure they align with local character and do not lead to overdevelopment. This includes reinstating more restrictive policies on building heights and ensuring new developments are consistent with the surrounding area's scale and character. These objections and recommendations aim to preserve the character of Winchmore Hill, protect essential community assets, and ensure that any future developments are sustainable and in keeping with the local environment. | Comments noted. The proposed redevelopment of the Sainsbury's site on Green Lanes is part of a strategic approach to meet Enfield's housing needs while maximizing the use of available land, especially in areas with good transport links and existing infrastructure. The Spatial Strategy and Overall Approach Topic Paper outlines the need for higher-density development in such locations to ensure sustainable growth and reduce the pressure on more sensitive areas like the Green Belt. The Sainsbury's site is particularly well-positioned for redevelopment given its proximity to public transport and local amenities, making it a suitable candidate for a more intensive use that aligns with the broader strategic goals of the Local Plan. Regarding concerns about the character and scale of new developments, the Site Allocation Topic Paper ensures that any redevelopment in Winchmore Hill, including at these specific sites, will be carefully designed to respect the local character and maintain the visual and environmental quality of the area. The Local Plan includes detailed design guidelines to ensure that new developments complement the existing urban fabric, particularly in areas with a strong residential character like Winchmore Hill. Additionally, the Council recognizes the importance of parking and access for local businesses, and any redevelopment will include provisions to mitigate the loss of parking spaces and ensure continued support for the local economy. | No | 01670 | Cllr Alexandrou |
| **URB.07: Sainsburys, Green Lanes** | The Councillor objects to redeveloping Sainsbury's on Green Lanes as set out in URB.07 for 368 homes. He highlights several concerns: the impact on Bush Hill Park residents' supermarket access, leading to increased congestion at other locations; inadequate consideration of local infrastructure like schools and doctor surgeries; reduced parking affecting nearby streets; unclear commercial servicing plans; environmental risks due to proximity to potable groundwater abstraction; and the potential loss of green space and impact on nearby heritage assets. | Comments noted. The proposed site allocation of Sainsbury's on Green Lanes for 368 new homes, while re-providing the supermarket with reduced parking, aligns with the National Planning Policy Framework (NPPF) as it supports sustainable urban growth. The plan includes measures to mitigate impacts on local infrastructure, such as schools and healthcare facilities, and ensures efficient servicing of commercial units. Environmental safeguards address groundwater concerns, and heritage considerations are incorporated to protect nearby assets. The strategy promotes sustainable transport options, reducing car dependency and minimizing traffic congestion. | No | 01779 | Cllr Fallart |
| **URB.07: Sainsburys, Green Lanes** | The Councillor on behalf of the Edmonton and Winchmore Hill Conservative Association objects to redeveloping Sainsbury's on Green Lanes for 368 homes as set out in URB.07. The Association highlights several concerns: the impact on | Comments noted. The proposed site allocation of Sainsbury's on Green Lanes for 368 new homes, while re-providing the supermarket with reduced parking, aligns with the National Planning Policy Framework (NPPF) as it supports sustainable | No | 01784 | Edmonton and Winchmore Hill |

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| | Bush Hill Park residents' supermarket access, leading to increased congestion at other locations; inadequate consideration of local infrastructure like schools and doctor surgeries; reduced parking affecting nearby streets; unclear commercial servicing plans; environmental risks due to proximity to potable groundwater abstraction; and the potential loss of green space and impact on nearby heritage assets. The Association advocates the removal of the site from the plan. | urban growth. The plan includes measures to mitigate impacts on local infrastructure, such as schools and healthcare facilities, and ensures efficient servicing of commercial units. Environmental safeguards address groundwater concerns, and heritage considerations are incorporated to protect nearby assets. The strategy promotes sustainable transport options, reducing car dependency and minimizing traffic congestion. | | | Conservative Association |
| **URB.08: Hoe, Eastfield, Cherry and Bouvier Estates** | TfL welcomes the requirement that development should minimise residential parking. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.08: Hoe, Eastfield, Cherry and Bouvier Estates** | For site URB.08, Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.08: Hoe, Eastfield, Cherry and Bouvier Estates** | For site URB.08, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.08: Hoe, Eastfield, Cherry and Bouvier Estates** | For site URB.08, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.09: Exeter Road Estate** | TfL welcomes the requirement that development should minimise parking. This should apply to all proposed uses, including residential and commercial. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.09: Exeter Road Estate** | Thames Water recommends that developers and the Local Planning Authority liaise with them early to agree on a housing phasing plan for developments in the catchment area. This is to ensure that water supply network infrastructure upgrades are completed before the occupation of new developments. Without early coordination, planning conditions may be imposed to control the phasing of development to prevent outpacing the delivery of essential upgrades. Developers can request information on network infrastructure through the Thames Water website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.09: Exeter Road Estate** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | | | | |
| **URB.09: Exeter Road Estate** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.10: Alma Estate** | TfL notes the requirement to provide limited parking but suggests it should be amended to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.10: Alma Estate** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site URB.10: Alma Estate as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site URB.10 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including URB.10, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **URB.10: Alma Estate** | For site URB.10, Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.10: Alma Estate** | For site URB.10, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.10: Alma Estate** | For site URB.10, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.10: Alma Estate** | Vistry Group supports the draft site allocation for the Alma Estate (SA URB.10) but requests updates to reflect their ongoing development and potential for 1,404 homes with buildings up to 17-storeys. They suggest adjusting the housing | The council appreciates Vistry Group's support and acknowledges the concerns regarding the wording of policy SA URB.10. The Council will continue to engage | Yes | 01897 | Vistry Group |

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| | capacity, delivery timeframe, and design principles to match current planning permissions and pre-application discussions. They also propose changes to the Tall Building Maps to ensure flexibility for future development phases and accurate height allowances, supporting optimal delivery of market and affordable housing. | with Vistry Group and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | | | |
| **URB.10: Alma Estate** | Better Homes critiques the Enfield Local Plan's (ELP) site allocation SA URB.10 for the Alma Estate, arguing that it is not legally compliant with the London Plan 2021. The group points out that the London Plan's Policies D3 and H1 require boroughs to optimize the capacity of brownfield sites, particularly those within 800 meters of a railway station, through a design-led approach that maximizes housing delivery. The Alma Estate, located near a railway station, is allocated for 127 homes in the ELP. However, the council has recently consulted on increasing this site's capacity by more than 400 homes, suggesting that the current allocation underutilizes the site's potential. The document argues that this underutilization means the site allocation is not in conformity with the London Plan and fails to meet the requirements for optimizing site capacity. To address these issues, the group recommends modifying the site allocation for the Alma Estate to reflect the full housing capacity of the site, including the additional 400+ homes that have been recently proposed. This change would ensure that the site allocation aligns with the London Plan's policies on optimizing land use and increasing housing supply, making the ELP legally compliant and sound. By doing so, the ELP remains flexible and responsive while ensuring compliance with the London Plan and the National Planning Policy Framework (NPPF). | Comments noted. The allocation of 127 homes for the Alma Estate reflects the current stage of development and planning permissions that have been secured for the site. The Site Allocation Topic Paper emphasizes the importance of a phased approach to development, especially in areas undergoing significant regeneration like the Alma Estate. While the council has consulted on the potential to increase housing delivery on this site by over 400 homes, the current allocation in the ELP is based on the most recent and confirmed planning permissions. This approach ensures that the Local Plan remains flexible and responsive to changes in site capacity as new planning applications and modifications are approved. Furthermore, the ELP's allocation of 127 homes does not preclude future adjustments based on ongoing consultations and planning processes. The Site Allocation Topic Paper highlights the plan's adaptability, allowing for updates to site allocations as new data and planning approvals become available. This ensures that the development remains sustainable, aligned with infrastructure capacity, and compliant with both the London Plan's Policies D3 and H1, which focus on optimizing site capacity through a design-led approach. The council is committed to revisiting and potentially increasing the site's housing capacity as part of its ongoing planning and development strategy, ensuring that the Alma Estate contributes effectively to meeting Enfield's housing needs. In summary, the current allocation for the Alma Estate in the ELP reflects the latest planning approvals while maintaining flexibility for future increases in housing capacity. This approach aligns with the broader objectives of the London Plan and the National Planning Policy Framework (NPPF), ensuring that the site's potential is optimized in a phased and sustainable manner. | Yes | 01708 | Better Homes Enfield |
| **URB.11: The Former Royal Chace Hotel** | For site URB.11, Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.11: The Former Royal Chace Hotel** | For site URB.11, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.11: The Former Royal Chace Hotel** | The Enfield Society is concerned that the removal of the Royal Chase Hotel site from the Enfield Chase Area of Special Character (ASC) has allowed the development of a visually intrusive housing estate. This development is prominent in views from the London LOOP footpath and Hadley Road, undermining the character and openness of the Green Belt. The Society emphasizes the importance of the ASC for maintaining the area's character and identity, suggesting | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. | No | 01794 | Enfield Society |

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| | that the landscape-led approach in Design Principle A has been ineffective in preserving these qualities. | The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | | | |
| **URB.12: 241 Green Street** | TfL notes the requirement to provide limited parking but recommends amending it to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.12: 241 Green Street** | Based on available data, the Environment Agency identifies that several sites, including Site URB.12, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site URB.12 specifically be classified within Flood Zone 2 and Flood Zone 3. Appendix C states this is FZ1 (page 479). This is incorrect. | The Council welcomes the EA's comments regarding Site URB.12 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **URB.12: 241 Green Street** | For site URB.12, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.12: 241 Green Street** | For site URB.12, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.12: 241 Green Street** | For URB.12, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.12: 241 Green Street** | Better Homes Enfield critiques the Enfield Local Plan's (ELP) site allocation SA URB.12 for 241 Green Street, arguing that it is not legally compliant with the London Plan 2021 and does not meet the soundness criteria set out in the National Planning Policy Framework (NPPF). The main issue highlighted is that the site has been allocated for 92 homes, despite having planning approval for 148 homes. This discrepancy suggests that the site has not been optimized for housing delivery, which is required by London Plan policies D3 and H1. These policies emphasize the need to maximize housing potential on suitable and available brownfield sites, especially those near transport hubs like 241 Green Street, which is in close proximity to a railway station. To address these concerns, the document recommends modifying the site allocation to reflect the actual housing capacity of | Comments noted. The Site Allocation Topic Paper outlines the strategic approach taken by Enfield Council in allocating sites like 241 Green Street for development, ensuring that each site aligns with both local needs and broader regional planning goals, including those set out in the London Plan 2021. The allocation of 92 homes for 241 Green Street is based on a design-led approach, which carefully considers the context, constraints, and opportunities specific to the site. This approach ensures that the development is appropriate in scale and form for the surrounding area, balancing the need to optimize housing delivery with the preservation of local character and infrastructure capacity. While the site has planning approval for 148 homes, the allocation in the ELP reflects a cautious and context-sensitive approach that prioritizes long-term sustainability and community integration. | Yes | 01708 | Better Homes Enfield |

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| | 148 homes as per the planning approval. This adjustment would bring the site allocation into conformity with the London Plan and ensure it aligns with the NPPF's requirements for optimizing land use and making effective use of brownfield sites. These changes would ensure that the site allocation is both legally compliant and sound, supporting Enfield's broader housing delivery goals. | Regarding the compliance with the London Plan and the National Planning Policy Framework (NPPF), it is important to note that the ELP's housing allocations, including 241 Green Street, are part of a broader strategy that seeks to distribute housing growth across the borough in a manner that supports local infrastructure and community well-being. The lower allocation does not preclude higher densities from being considered at the planning application stage, where detailed assessments can address site-specific issues such as infrastructure, design quality, and community impact. The flexibility embedded within the ELP allows for potential revisions as part of ongoing planning processes, ensuring that site allocations remain responsive to evolving local and regional needs. The council maintains that the allocation of 92 homes at 241 Green Street within the ELP reflects a balanced approach to site development, consistent with the broader strategic objectives of the Local Plan. This allocation allows for future adjustments based on detailed planning applications while ensuring that the development aligns with both the London Plan and the NPPF's emphasis on sustainable, context-sensitive growth. | | | |
| **URB.13: Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate** | TfL welcomes the requirement that the development should minimise residential parking. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.13: Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate** | The Environment Agency notes that development on historic landfills, such as Site URB.13: Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **URB.13: Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate** | For URB.13, Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **URB.13: Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate** | For site URB.13, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.13: Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate** | For site URB.13, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.14: Four Hills Estate, Lavender Hill** | TfL welcomes the requirement that the development should minimise residential parking. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.14: Four Hills Estate, Lavender Hill** | For site URB.14, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.14: Four Hills Estate, Lavender Hill** | For site URB.14 the Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.15: Kettering Road Estate** | TfL welcomes the requirement that the development should minimise residential parking. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.15: Kettering Road Estate** | Based on available data, the Environment Agency identifies that several sites, including Site URB.15, are either partly or wholly within Flood Zones 2 or 3. The | The Council welcomes the EA's comments regarding Site URB.15 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its | Yes | 01926 | Environment Agency |

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| | EA recomends that Site URB.15 specifically be classified within Flood Zone 2 and Flood Zone 3. Appendix C states Flood Zone 'No' (page 485). This is incorrect. | flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | | | |
| **URB.15: Kettering Road Estate** | For site URB.15, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.15: Kettering Road Estate** | For site URB.15, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.15: Kettering Road Estate** | For site URB.15, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.16: 188-200 Bowes Road** | TfL welcomes the requirement that the development should minimise parking. This should apply to both residential and commercial uses. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.16: 188-200 Bowes Road** | For site URB.16, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.16: 188-200 Bowes Road** | For site URB.16, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.16: 188-200 Bowes Road** | For site URB.06, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | | | | |
| **URB.17: Main Avenue Site** | TfL welcomes the requirement for the development to contribute towards improvements to access and facilities at Bush Hill Park station. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.17: Main Avenue Site** | For site URB.17, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.17: Main Avenue Site** | For site URB.17, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.18: Land at Ritz Parade** | TfL notes the requirement for the development to provide limited residential parking but suggests it should be amended to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.18: Land at Ritz Parade** | For site URB.18, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.18: Land at Ritz Parade** | For site URB.18, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.18: Land at Ritz Parade** | For site URB.18, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **URB.19: Albany Leisure Centre and Car Park** | TfL welcomes the requirement to minimise residential parking but suggests this requirement should also apply to the re-provided leisure centre. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.19: Albany Leisure Centre and Car Park** | For site URB.19, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.19: Albany Leisure Centre and Car Park** | For site URB.19, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.19: Albany Leisure Centre and Car Park** | For site URB.19, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.19: Albany Leisure Centre and Car Park** | LBESPS supports the allocation of Albany Leisure Centre (SA URB.19) for approximately 30 extra care homes and community space at ground level while retaining/renewing the leisure centre. They emphasize the importance of engaging with the local Care Trust and existing leisure centre users. They advocate for co-locating extra care housing with the leisure centre, coordinating with adjacent site SA URB.08, and comprehensive resident engagement. They support a development timeframe of up to 10 years, highlighting the site's sustainability and prioritizing it for development. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **URB.20: Cuckoo Hall Lane Estate** | TfL welcomes the requirement to minimise residential parking for the development. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.20: Cuckoo Hall Lane Estate** | Based on available data, the Environment Agency identifies that several sites, including Site URB.20, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site URB.20 specifically be classified within Flood Zone 2 and Flood Zone 3. Appendix C states Flood Zone 'No' (page 495). This is incorrect. | The Council welcomes the EA's comments regarding Site URB.20 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |

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| **URB.20: Cuckoo Hall Lane Estate** | For site URB.20, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.20: Cuckoo Hall Lane Estate** | For site URB.20, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.21: Moorfield Health Centre** | TfL welcomes the requirement to minimise parking for the development. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.21: Moorfield Health Centre** | The Environment Agency notes that development on historic landfills, such as Site URB.21: Moorfield Health Centre, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **URB.21: Moorfield Health Centre** | For site URB.21, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.21: Moorfield Health Centre** | For site URB.22, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.21: Moorfield Health Centre** | For site URB.22, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.21: Moorfield Health Centre** | Better Homes Enfield critiques the Enfield Local Plan's (ELP) site allocation SA URB.21 for the Moorfield Health Centre, arguing that it is not legally compliant with the London Plan 2021 and does not meet the soundness criteria set out in the National Planning Policy Framework (NPPF). The group points out that the site is | Comments noted. The allocation of 52 homes for the Moorfield Health Centre site is based on a strategic and design-led approach, as outlined in the Site Allocation Topic Paper. This allocation reflects the current planning strategy and the need to balance housing delivery with other planning considerations, such as infrastructure | Yes | 01708 | Better Homes Enfield |

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| | allocated for 52 homes in the ELP, despite having planning approval for 100 homes. This discrepancy suggests that the site's capacity has not been optimized, which violates London Plan Policies D3 and H1. These policies mandate that developments must make the best use of land, particularly on brownfield sites near transport hubs, by following a design-led approach that maximizes site capacity. To address these issues, the document recommends modifying the site allocation for Moorfield Health Centre to reflect the full potential of the site, consistent with its planning approval of 100 homes. This adjustment would ensure that the site allocation is both legally compliant with the London Plan and consistent with the NPPF's emphasis on optimizing land use, particularly on brownfield sites. By aligning the site allocation with the planning approval, the ELP would better support the strategic goal of maximizing housing delivery in sustainable locations, thereby meeting both local and regional housing needs. | capacity, environmental constraints, and community impact. The allocation of 52 homes was determined through a careful assessment of the site's context, including its proximity to existing residential areas, transportation links, and the broader urban environment. This approach is consistent with the London Plan's Policy D3, which emphasizes the importance of optimizing site capacity while ensuring that developments are appropriate in scale and form for their context. While the site has planning approval for up to 100 homes, the allocation in the ELP is intended to provide flexibility within the planning framework, allowing for adjustments based on detailed planning applications and site-specific assessments. The ELP's approach allows for potential increases in housing capacity through future planning applications, ensuring that the site can be developed in a manner that aligns with both local needs and broader regional planning objectives. The flexibility embedded in the ELP ensures that the plan remains responsive to changing conditions and can adapt to optimize land use in line with the National Planning Policy Framework (NPPF) and the London Plan's policies on housing supply (Policy H1) and site capacity optimization (Policy D3). In summary, the allocation of 52 homes at Moorfield Health Centre within the ELP reflects a balanced and context-sensitive approach to site development. This approach allows for flexibility and future adjustments, ensuring that the site's development aligns with both the London Plan and the NPPF, while meeting Enfield's housing needs in a sustainable and strategically sound manner. | | | |
| **URB.22: Oakwood Station Car Park** | TfL welcomes the requirement to limit vehicular parking to drop-off, servicing, and accessible bays. They recommend amending the wording to clarify that this means car-free development. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.22: Oakwood Station Car Park** | For site URB.22, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.22: Oakwood Station Car Park** | For site URB.22, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.22: Oakwood Station Car Park** | Places for London strongly welcome Enfield's inclusion of the Oakwood Station Car Park as a Draft Site Allocation, following previous submissions in Enfield Call for Sites (February 2021) and Enfield Local Plan Main Issues and Preferred Approaches (June 2021) consultations. The site has excellent public transport accessibility, with good access to local services, amenities, and shops.<br>Places for London highlighted that should a site allocation be included for just the car park site (as evident in the Reg 19 Draft Local Plan draft site allocation) then we would suggest this should be for residential-led development and include a site capacity of approximately 65 units. Therefore, Places for London recommend that the Approximate Estimated Housing Capacity is increased from 52 units to 65 units. The HELAA 2021 assessed the site (site reference COCII), with the Housing topic paper clarifying the site selection methodology and setting out that a size threshold of 50 homes+ or 0.25ha was used to select sites to allocate. Oakwood Station car park has a larger site area of 0.32 ha and Places for London has undertaken various capacity studies which show that the site could provide | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |

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| | between 52 and 80 homes (with heights of 3 to 6 storeys). Development could potentially explore the integration of adjacent land, including the retail parade fronting Bramley Road. | | | | |
| **URB.22: Oakwood Station Car Park** | The Enfield Over 50s Forum's expresses concerns about the Enfield Local Plan 2019-2041, specifically regarding the proposal to develop 52 dwellings near Oakwood Station (URB.22). The representor objects to the closure of the station's car park, citing potential negative impacts such as increased housing density without adequate services, parking displacement into surrounding streets, higher emissions, and the contradiction with the Local Plan's goal of promoting sustainable transport. Additionally, the development could harm Oakwood Station, a listed landmark. Sadaf recommends modifying the Local Plan to avoid closing the car park and ensure the development aligns with sustainable transport and infrastructure goals. | Comments noted. The concerns about Site Allocation SA URB.22, including the closure of Oakwood Carpark impacting environmental sustainability, accessibility, and local congestion, are acknowledged. The Council's planning framework includes measures to address these issues by enhancing public transport links, providing alternative parking solutions, and safeguarding accessibility for individuals with mobility issues. Additionally, the council must ensure that development does not negatively affect listed landmarks or local heritage and that increased housing density is matched with adequate services and infrastructure. Addressing these concerns through effective mitigation strategies and infrastructure improvements will help align the development with sustainability and community needs. | No | 01765 | Enfield Over 50s Forum |
| **URB.22: Oakwood Station Car Park** | The Enfield Society's concerns regarding Design Principles H and are centered on the lack of clarity and thorough assessment of the impact on heritage assets. Design Principle H suggests that tall buildings up to 39m high should be located centrally north of the railway line and carefully considered south of the railway line to mitigate heritage impacts. Design Principle I states that development must consider long views from Trent Park Conservation Area. However, the term "consider" is vague, and it is unclear how decision-makers should interpret it. The Enfield Society argues that the impact on Trent Park Conservation Area and the Registered Historic Park and Garden should be thoroughly assessed and established before setting development principles in the Local Plan. | The Enfield Local Plan recognizes the importance of safeguarding heritage assets. The development principles in Design Principles H and I seek to balance the need for growth with the protection of these sensitive areas. The use of the term "consider" in the context of long views and the siting of tall buildings emphasizes a careful, case-by-case approach that allows for flexibility while ensuring heritage impacts are thoroughly assessed. The Site Allocation Topic Paper provides further clarification by outlining the detailed assessments undertaken to ensure that developments are aligned with both local and national heritage conservation standards. As part of the development process, full heritage impact assessments will be required, particularly for sites near designated heritage assets, to mitigate any adverse effects. The Council is committed to refining these principles as the Local Plan progresses to ensure robust protection of Enfield's heritage while facilitating sustainable development. | No | 01794 | Enfield Society |
| **URB.22: Oakwood Station Car Park** | The Conservative Group objects to the proposed development at Oakwood Station Car Park (URB.22), citing that it would result in the loss of valuable amenities and exacerbate parking issues, particularly affecting residents with mobility issues. They also raise concerns about the potential harm to views of the listed Oakwood Station. | Comments noted. The Council emphasizes that the proposed development at Oakwood Station Car Park (URB.22) is part of a strategy to address Enfield's housing needs in areas well-served by public transport, like the Piccadilly Line at Oakwood. While acknowledging concerns about parking and accessibility for residents with mobility issues, the Council will ensure that these needs are addressed through careful planning, including accessible alternatives and improved public transport access. Additionally, any development will undergo rigorous design and heritage assessments to protect the views and character of the listed Oakwood Station, integrating the new structures sensitively into the surrounding area. | No | 01670 | Cllr Thorp |
| **URB.22: Oakwood Station Car Park** | The Enfield Conservative Group has expressed significant concerns regarding the Draft Enfield Local Plan, particularly the proposals outlined in Policy SS1 for developments in the Cockfosters Ward. They strongly oppose the inclusion of tall buildings in the area, specifically near the Cockfosters Underground Station, arguing that such developments would disrupt the views from the Trent Park Conservation Area and fundamentally alter the suburban character of Cockfosters. The group believes that allowing buildings up to 39 meters high would transform Cockfosters from a village-like community into an environment resembling a built-up inner London town center, which they argue would be inappropriate for the area. In addition to concerns about tall buildings, the Conservative Group also objects to the proposed development on Green Belt land between Camlet Way and Crescent Way. They argue that this site is vital for preserving the village feel and maintaining the character of nearby Conservation Areas such as Hadley Wood and Monken Hadley. They recommend removing specific proposals related to Chase Park, Crews Hill, Hadley Wood, and the Cockfosters Station Car Park from Policy SS1 and revisiting the policy on tall buildings to ensure it aligns with preserving the area's low-rise character. They also suggest revising Policy H4 to focus solely on brownfield sites, in line with the London Plan's emphasis on utilizing previously developed land. | Comments noted. The Draft Local Plan was developed with a strategic and evidence-based approach, aligning with both the London Plan 2021 and the National Planning Policy Framework (NPPF). The Spatial Strategy and Overall Approach Topic Paper outlines how the Plan addresses Enfield's specific needs, including the preservation of local character while meeting housing demands. The proposals for tall buildings in Cockfosters, for instance, are carefully considered in the context of their potential impact on the area's character. The Design and Character evidence base further supports this by ensuring that any new development, including taller buildings, will be designed to complement and enhance the existing urban fabric and natural landscapes, particularly in sensitive areas like the Trent Park Conservation Area. Regarding the Green Belt, the Council conducted a rigorous Green Belt Review as part of the plan-making process. This review identified areas where "exceptional circumstances" justify the release of Green Belt land, considering the borough's pressing housing needs and the limited availability of brownfield sites. The proposed developments in Green Belt areas, including those in Cockfosters, are part of a broader strategy to distribute growth across the borough sustainably while minimizing the impact on the most sensitive areas. The Plan includes provisions for infrastructure improvements to support these developments, ensuring they are sustainable and | No | 01670 | Enfield's Conservative Group |

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| | | aligned with both local and regional planning guidelines. The Council remains committed to ongoing consultation and will consider further refinements to ensure that the Plan reflects the needs and priorities of the entire community. | | | |
| **URB.22: Oakwood Station Car Park** | Residents are deeply concerned about the impact of closing the Oakwood Station Car Park under URB.22, particularly on individuals with mobility issues who rely on the station's street-level access. They argue that the loss of this parking facility would make it significantly harder for these individuals to use the station, as the limited number of additional disabled parking spots proposed would not adequately address their needs. Furthermore, the closure is expected to force more vehicles onto already congested nearby streets, exacerbating traffic jams, increasing frustration among local residents, and potentially creating safety hazards. Increased on-street parking would also contribute to higher vehicle emissions, negatively impacting air quality and public health, especially for children. Additionally, residents view the car park as a long-standing component of the historic station, and its removal is seen as diminishing the station's historical significance. | Comments noted. The Spatial Strategy and Overall Approach Topic Paper emphasizes that any changes to transportation infrastructure must prioritize accessibility for individuals with mobility issues. To mitigate the impact of car park closure, the plan includes provisions for enhancing accessible transportation options and improving connections to the station. The Site Allocation Topic Paper acknowledges the potential increase in on-street parking and its associated challenges, proposing measures to manage and mitigate congestion, such as implementing controlled parking zones and improving local traffic management. Additionally, the plan recognizes the historical significance of the car park as part of the station's heritage and outlines strategies for preserving the station's character while accommodating necessary updates. These measures aim to balance the need for modern development with maintaining accessibility, safety, and historical value for the community. | No | 01762 | Cllr O'Halloran |
| **URB.22: Oakwood Station Car Park** | The Councillor objects to the proposed closure of the car park at Oakwood Station, as outlined in URB.22, with plans to construct 52 dwellings on the site. He argues that the proposal fails to meet the NPPF soundness test, as it contradicts the goal of promoting sustainable transport, especially for individuals with mobility challenges. The closure would worsen parking issues and increase emissions in surrounding streets due to displaced vehicles. Additionally, the housing blocks would detract from the character of the listed station building and intensify housing density without providing necessary infrastructure, such as GP surgeries and schools, thereby creating further inconvenience for commuters and local residents alike. | Comments noted. The plan emphasizes sustainable development and transport, reducing car dependency, and encouraging alternative travel modes. The introduction of housing near public transport hubs aligns with the aim of maximizing land use efficiency and supporting local housing needs. Infrastructure improvements and design considerations will ensure accessibility and integration with existing community services, mitigating concerns about parking displacement and service provision. | No | 01779 | Cllr Fallart |
| **URB.23: Stoneleigh Avenue Estate** | TfL supports streetscape improvements but emphasizes that any proposals affecting the A10 or its frontage should be agreed with TfL. They also state there should be no direct vehicle access (for parking or servicing) from the A10. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.23: Stoneleigh Avenue Estate** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site URB.23: Stoneleigh Avenue Estate as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site URB.23 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including URB.23, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **URB.23: Stoneleigh Avenue Estate** | For site URB.23, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.23: Stoneleigh Avenue Estate** | For site URB.23, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | | | | |
| **URB.23: Stoneleigh Avenue Estate** | For site URB.23, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.24: Fore Street Estate** | For site URB.24, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.24: Fore Street Estate** | For site URB.24, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.24: Fore Street Estate** | For site URB.24, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.25: Pevency Avenue** | TfL welcomes the requirement to minimise residential parking for the development. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.25: Pevency Avenue** | For site URB.25, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.25: Pevency Avenue** | For site URB.25, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | | | | |
| **URB.25: Pevency Avenue** | For site URB.25, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.26: Fords Grove Car Park** | TfL welcomes the requirement to minimise residential parking. They recommend amending the wording to clarify that the existing car park should not be re-provided. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.26: Fords Grove Car Park** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site URB.26: Fords Grove Car Park as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site URB.26 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including URB.26, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **URB.26: Fords Grove Car Park** | For site URB.26, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.26: Fords Grove Car Park** | For site URB.26, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.26: Fords Grove Car Park** | For site URB.26, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **URB.26: Fords Grove Car Park** | LBESPS supports the allocation of Ford's Grove Car Park (SA URB.26) for new homes, noting the site's suitability for residential development, subject to detailed design and servicing considerations. They agree with the estimated capacity of 29 homes, acknowledging it will depend on detailed planning. They support a development timeframe of up to 10 years, highlighting the site's sustainability and accessibility to Winchmore Hill Station. The site is seen as deliverable and prioritized for development. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **URB.26: Fords Grove Car Park** | The Enfield Conservative Group objects to the proposed development at Ford's Grove Car Park, citing concerns that the loss of this parking facility would negatively impact local businesses on Green Lanes by reducing access for shoppers. They argue that the car park is essential, particularly since other parking options have been reduced due to cycle lane installations. The redevelopment is seen as likely to result in overdevelopment that is out of character with the predominantly two-story terraces in the area. The Conservative Group recommends deleting the proposals Ford's Grove Car Park (SA URB.26) from the Local Plan to preserve the character of Winchmore Hill and protect vital community amenities.<br>Reevaluate Housing Policies: They suggest revisiting the policies on housing to ensure they align with local character and do not lead to overdevelopment. This includes reinstating more restrictive policies on building heights and ensuring new developments are consistent with the surrounding area's scale and character.<br>They consider these objections and recommendations aim to preserve the character of Winchmore Hill, protect essential community assets, and ensure that any future developments are sustainable and in keeping with the local environment. | Comments noted. The proposed redevelopment of the Ford's Grove Car Park (SA URB.26) is part of a strategic approach to meet Enfield's housing needs while maximizing the use of available land, especially in areas with good transport links and existing infrastructure. The Spatial Strategy and Overall Approach Topic Paper outlines the need for higher-density development in such locations to ensure sustainable growth and reduce the pressure on more sensitive areas like the Green Belt. Regarding concerns about the character and scale of new developments, the Site Allocation Topic Paper ensures that any redevelopment in Winchmore Hill, including at these specific sites, will be carefully designed to respect the local character and maintain the visual and environmental quality of the area. The Local Plan includes detailed design guidelines to ensure that new developments complement the existing urban fabric, particularly in areas with a strong residential character like Winchmore Hill. Additionally, the Council recognizes the importance of parking and access for local businesses, and any redevelopment will include provisions to mitigate the loss of parking spaces and ensure continued support for the local economy. | No | 01670 | Cllr Alexandrou |
| **URB.27: South Street** | TfL notes the requirement to provide limited residential parking but suggests it should be amended to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.27: South Street** | For site URB.27, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.27: South Street** | For site URB.27, Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.27: South Street** | For site URB.27, Thames Water notes that the development boundary is within a Source Protection Zone for groundwater abstraction, which could be at risk from polluting activities. To prevent pollution, a tiered, risk-based approach will be used by the Environment Agency and Thames Water to regulate activities impacting groundwater resources. The applicant is encouraged to review the Environment Agency's approach to groundwater protection and may consult with a qualified environmental consultant to understand the implications for their development. More information is available at Environment Agency's groundwater protection | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | position statements. | | | | |
| **RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road** | TfL does not consider the sites at Chase Park (PL10) SA10.1 – SA10.4, Crews Hill (PL11) SA11.1 – SA11.6, land opposite Enfield Crematorium (RUR.01), and land between Camlet Way and Crescent West, Hadley (RUR.02) suitable for housing. This is due to their poor transport connectivity and the high costs required to provide sustainable transport access comparable to urban sites in the borough. Developing these sites is likely to lead to car-dependent development, which is contrary to the Good Growth objectives of the London Plan and the NPPF. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road** | TfL notes that the site has a PTAL of 1b and it is unlikely that further public transport or active travel improvements could adequately support the proposed 291 homes. They observe that the design principles do not require parking to be minimised, likely resulting in a car-dominated development that is not well connected and does not align with the London Plan principles of Good Growth. TfL is also likely to object to any proposed vehicle access directly from the A10, as specified in the design principles. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site RUR.01 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including RUR.01, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road** | The Environment Agency notes that development on historic landfills, such as Site RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road** | For site RUR.01, Thames Water indicates that the scale of the proposed developments will likely necessitate upgrades to the water supply network infrastructure. They recommend early liaison between the Developer, Local Planning Authority, and Thames Water to agree on a housing phasing plan. This plan should outline the required phasing to ensure that infrastructure upgrades are completed before development occupation. Failure to coordinate may result in planning conditions at the application stage. Developers can request information on network infrastructure from Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **RUR.01: Land opposite Enfield** | For site RUR.01, Thames Water does not anticipate any infrastructure concerns regarding wastewater networks for the proposed development(s). However, they recommend that the Developer and the Local Planning Authority engage with | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **Crematorium (known as The Dell), Great Cambridge Road** | Thames Water early to discuss the development's phasing. For further details, developers should contact Thames Water Development Planning via email (Devcon.team@thameswater.co.uk), phone (02035779998), or in writing (Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ). | | | | |
| **RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road** | For site RUR.01, Thames Water notes that the development boundary is within a Source Protection Zone for groundwater abstraction, which is vulnerable to pollution from surface or subsurface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate potentially impacting activities. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. Further information can be found here. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road** | Forty Leisure Limited and Jubilee Church are supportive of the Local Plan's allocation of Site SA RUR.01 (Land Opposite Enfield Crematorium). They believe the site is ideal for their needs due to its strategic location within Enfield, good road access, and proximity to public transport, including Turkey Street Rail Station and bus routes. Jubilee Church, in particular, supports the plan's provision for community uses and the site's release from the Green Belt under Spatial Policy SS1. They argue that the site's designation for a purpose-built church and community hub aligns well with their objectives and the plan's goals for sustainable development. | Support noted. The Local Plan's commitment to integrating community facilities and enhancing accessibility aligns with the feedback received from various stakeholders, including their support for the release of the land from the Green Belt. | No | 01876 | Forty Leisure Limited and Jubilee Church |
| **RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road** | Forty Leisure Limited and Jubilee Church have expressed strong support for the allocation of Site SA RUR.01 (Land Opposite Enfield Crematorium) in the draft Local Plan. They highlight that the site is ideal for a mixed-use development, including a purpose-built church and community hub, due to its strategic location, good road access, and accessibility via Turkey Street Rail station and local bus services. They commend the allocation's focus on community uses and its designation for non-residential development along the A10. Additionally, they support the site's release from the Green Belt, as outlined in the Spatial Policy SS1, to facilitate the development. | Support noted. The Local Plan's commitment to integrating community facilities and enhancing accessibility aligns with the feedback received from various stakeholders, including their support for the release of the land from the Green Belt. | No | 01876 | Forty Leisure Limited and Jubilee Church |
| **RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road** | The Enfield Society's concerns regarding the proposed development on this Green Belt and open space site highlight the inconsistency with London Plan Policy G1, which protects such areas. They question the adequacy of the heritage impact assessment, especially regarding views from Forty Hill Conservation Area, and the lack of detailed evidence, such as Vucities modelling. Additionally, concerns are raised about the delayed implementation due to potential environmental permits, suggesting that an earlier survey could clarify the timeframe for delivering the proposed 291 dwellings. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | HCC's response highlights that the site includes a section of the main river Monken Mead Brook, which drains areas of Hertfordshire. Discharge rates and volumes must be restricted to greenfield rates to ensure upstream areas in Hertfordshire can drain effectively. The site (RUR.02) also contains areas within Flood Zone 2 and 3, and HCC recommends consulting the Environment Agency on any proposals for this site. | Comments noted. The Council acknowledge the importance of restricting discharge rates and volumes to greenfield rates to facilitate effective drainage of upstream areas in Hertfordshire. Additionally, the Council will consult with the Environment Agency on any proposals for the site, especially concerning areas within Flood Zones 2 and 3. The Council will seek to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and the Environment Agency. | Yes | 01755 | Hertfordshire County Council as Lead Local Flood Authority (LLFA) |
| **RUR.02: Land between Camlet Way** | TfL recommends amending the criteria in Part 2a to avoid subjective terms like "good" or "bad." Instead, they suggest specifying "sites with a PTAL of 3 – 6" to provide clearer and more objective criteria. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of | No | 01891 | Transport for London |

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| **and Crescent West, Hadley Wood** | | Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | | | |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | TfL notes that the site has a PTAL of 1, making it unlikely that public transport or active travel improvements could support the proposed 160 homes. While they support the requirement to minimise parking, this could be undermined by the Hadley Neighbourhood Plan, which permits higher parking levels than the London Plan. The Neighbourhood Plan cites evidence of high car reliance among existing residents, suggesting the development will likely be car-dominated, not well connected, and inconsistent with the London Plan principles of Good Growth. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | Hertsmere expres importance of careful layout and design to prevent encroachment and maintain the strategic purposes of the Green Belt. | Comments noted. Exceptional Circumstances for the release of Green Belt are set out in the relevant Topic Paper. Further engagement and statement of common ground to consider how to resolve issue. | No | 01924 | Hertsmere Borough Council |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | Based on available data, the Environment Agency identifies that several sites, including Site RUR.02, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site RUR.02 specifically be classified within Flood Zone 2 and Flood Zone 3. Appendix C states this is FZ1 (page 511). This is incorrect. | The Council welcomes the EA's comments regarding Site RUR.02 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | LB Barnet expresses concern regarding the allocation of site SA.RUR.02: Land Between Camlet Way and Crescent West, Hadley, in LB Enfield's draft Local Plan for 160 homes. The site is adjacent to Green Belt land in LB Barnet, and Barnet is particularly worried about the potential detrimental effects on the openness of the Green Belt. While the proposed design principles in the Reg 19 draft Local Plan aim to mitigate impact by retaining trees, hedgerows, and limiting building heights to 18m, LB Barnet remains concerned that these measures may not sufficiently prevent adverse spatial and visual impacts on the Green Belt. Barnet's policy ECC05 in their draft Local Plan prioritizes protecting land from inappropriate development based on national Green Belt policy, considering both spatial and visual impact, traffic, and remediation prospects. LB Barnet requests ongoing consultation on any proposals that could impact the Green Belt within their borough. | The council appreciate LB Barnet's feedback on the site allocation SA.RUR.02 and understand their concerns about the impact on the Green Belt and the Monken Hadley Conservation Area. The design principles within the site allocation have been developed to mitigate these impacts, as outlined in the Site Allocation Topic Paper. The Council is committed to ongoing consultation with LB Barnet to ensure that development respects the openness of the Green Belt and the character of the Conservation Area. Further engagement and a Statement of Common Ground will be pursued to resolve these issues collaboratively. | No | 02091 | London borough of Barnet |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | LB Barnet raises concerns about the impact of the site allocation SA.RUR.02 (land between Camlet Way and Crescent Way) on the adjacent Monken Hadley Conservation Area. Barnet will resist any proposals that negatively affect the character, appearance, or setting of the Conservation Area. They request that both the Green Belt and the Monken Hadley Conservation Area be specifically referenced within the site allocation. However, Barnet supports the design principles set out in the Reg 19 draft Local Plan, particularly the emphasis on improving pedestrian and cycle connections and the careful consideration of the impact on the adjacent Monken Hadley Conservation Area. | The council appreciate LB Barnet's feedback on the site allocation SA.RUR.02 and understand their concerns about the impact on the Green Belt and the Monken Hadley Conservation Area. The design principles within the site allocation have been developed to mitigate these impacts, as outlined in the Site Allocation Topic Paper. The Council is committed to ongoing consultation with LB Barnet to ensure that development respects the openness of the Green Belt and the character of the Conservation Area. Further engagement and a Statement of Common Ground will be pursued to resolve these issues collaboratively. | Yes | 02091 | London borough of Barnet |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Duchy of Lancaster supports the Draft Local Plan's housing targets, recognizing the need for a significant amount of new housing to meet Enfield's requirements. They highlight the Camlet Way site (RUR.02) as available and deliverable within the first five years of the plan, contributing approximately 160 units to help address the housing supply deficit. They emphasize the site's lack of dependency on significant infrastructure improvements, which facilitates timely delivery. This site is considered crucial for meeting Enfield’s development needs and addressing the previous shortfall in housing supply. | Support noted. The Council appreciate the support and comments from the Duchy of Lancaster regarding the Draft Local Plan and the site at Camlet Way. The strategic allocation of housing sites, including RUR.02, is guided by robust evidence and a comprehensive understanding of local housing needs, as detailed in the Site Allocation Topic Paper, Exceptional Circumstances Topic Paper, and ELP Spatial Strategy and Overall Approach. The early delivery of Camlet Way within the first five years will indeed bolster our housing supply and help meet the | No | 01672 | Duchy of Lancaster |

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| | | accrued deficit. The Council welcome further engagement and a statement of common ground to ensure the successful delivery of this important site. | | | |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Duchy of Lancaster supports the infrastructure requirements and design principles in Site Allocation RUR.02. They highlight that the site is available and could be developed within the first five years of the plan period. The Enfield Site Allocation Topic Paper (2024) indicates that the benefits of developing this site, when balanced with strategic exceptional circumstances, justify its release from the Green Belt. The Duchy of Lancaster concurs with the Council's assessment that the exceptional circumstances for releasing this site from the Green Belt are met. | Comments noted. The Council acknowledges and appreciates the Duchy of Lancaster's support for the infrastructure requirements and design principles set out in Site Allocation RUR.02. The Council agrees that the site's availability and potential for development within the first five years align well with strategic planning objectives. The exceptional circumstances justifying the release of this site from the Green Belt are robustly supported by the plan's evidence base, including the Site Allocation Topic Paper (2024), Exceptional Circumstances Topic Paper, and ELP Spatial Strategy and Overall Approach Topic Paper. The Council welcome further engagement and collaboration to ensure the site's successful development. | No | 01672 | Duchy of Lancaster |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Duchy of Lancaster argues that the site (RUR.02) at Hadley Wood offers limited contribution to Green Belt purposes. The site is separated from other urban areas by natural features, does not affect the gap between Greater London and Potters Bar, and is enclosed by mature planting, reducing its countryside distinction. It minimally impacts the Hadley Wood Conservation Area, with any effects mitigable through design and landscaping. The allocation of this site is necessary to meet Enfield's housing targets and does not hinder urban regeneration. | Comments noted. The Council acknowledges the Duchy of Lancaster's position regarding the limited contribution of the Hadley Wood site to Green Belt purposes. The council's assessment, as detailed in the Site Allocation Topic Paper and the Exceptional Circumstances Topic Paper, justifies the site's allocation for development. Enfield remains committed to sustainable growth while respecting the character of surrounding areas. The council welcome further dialogue to ensure the development aligns with both strategic goals and community needs. | No | 01672 | Duchy of Lancaster |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Duchy of Lancaster acknowledges that Enfield's Green Belt Assessment (2023) identifies a well-defined field boundary to the west of the site, indicating that releasing the site would have minimal impact on the adjacent Green Belt. The boundary, characterized by established vegetation, would enable development to extend the existing urban edge northwards while establishing a clear and defensible limit. Consequently, the site (RUR.02) is considered suitable for release, with any localized impacts mitigated as outlined in the policy. This approach is consistent with the conclusions of both the Exceptional Circumstances Topic Paper and the Site Allocation Topic Paper. | Comments noted. The Council appreciates the detailed assessment provided by the Duchy of Lancaster regarding the Green Belt site at Hadley Wood. Enfield's Green Belt Assessment (2023) supports this view, confirming that the site's release would have minimal impact due to the well-established field boundary and vegetation. The site's development is crucial for meeting housing targets, and any localized impacts will be effectively mitigated. This approach is justified by the findings in the Site Allocation Topic Paper and the Exceptional Circumstances Topic Paper. The council welcome continued engagement to ensure that the development aligns with strategic goals and community needs. | No | 01672 | Duchy of Lancaster |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Duchy of Lancaster acknowledges that Paragraph 147 of the NPPF emphasizes the importance of prioritizing land well-served by public transport when considering the release of Green Belt land for development. The Hadley Wood site (RUR.02) is ideally positioned adjacent to Hadley Wood Station, offering direct rail links to both Welwyn Garden City and London (Moorgate). It is also conveniently located near local bus stops, amenities, and essential services, including a primary school and a local shopping parade. This strategic location aligns with the NPPF's sustainability criteria, making the site a well-suited option for development. | Comments noted. The Council acknowledges the strategic advantages of the site at Hadley Wood, particularly its proximity to Hadley Wood Station, local bus services, and essential amenities. This aligns with Paragraph 147 of the NPPF, which emphasizes prioritizing land well-served by public transport for Green Belt release. The site's sustainable location and accessibility support its allocation for development, contributing to Enfield's housing targets while adhering to national planning policy. This approach is justified by the Site Allocation Topic Paper and the Exceptional Circumstances Topic Paper. Further engagement to ensure alignment with planning objectives is welcome. | No | 01672 | Duchy of Lancaster |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Duchy of Lancaster supports the allocation and Green Belt release of the Camlet Way site (RUR.02) for residential development, recognizing its critical role in meeting Enfield's significant housing needs over the next five years and throughout the Plan period. The site offers a unique opportunity for lower-density family and affordable housing, distinct from the high-density developments in the borough's east. They look forward to continued collaboration with the Council to ensure a high-quality, sustainable scheme that benefits the Hadley Wood community. | Comments noted. The Council appreciates the support from the Duchy of Lancaster for the allocation and release of the Camlet Way site from the Green Belt to meet Enfield's significant housing needs. This decision is supported by the Site Allocation Topic Paper and the Exceptional Circumstances Topic Paper, which outline the strategic and local level justifications for Green Belt release. The site's sustainable location, adjacent to Hadley Wood Station and local amenities, further aligns with NPPF guidelines. The council look forward to continued collaboration to deliver a high-quality, sustainable development that benefits the Hadley Wood community and contributes to the borough's housing targets. Further engagement and a Statement of Common Ground will be essential in refining and ensuring the successful implementation of the proposed policies. | No | 01672 | Duchy of Lancaster |
| **RUR.02: Land between Camlet Way and Crescent** | RUR.02, Thames Water does not anticipate infrastructure concerns for wastewater networks regarding this development. However, they recommend that the developer and the Local Planning Authority liaise with Thames Water early to discuss development phasing. For further coordination, Thames Water Development Planning can be contacted via email at | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **West, Hadley Wood** | Devcon.team@thameswater.co.uk, by phone at 02035779998, or by mail at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | | | | |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | LBESPS supports the allocation of land between Camlet Way and Crescent Way (SA RUR.02) for new homes, emphasizing sustainable design that respects the surrounding Green Belt and SINC. They endorse early engagement with Historic England and Thames Water due to the site's location in an Archaeological Priority Area and potential wastewater network upgrades. They agree with the estimated capacity of 160 new homes and the 10-year development timeframe. The site is seen as a deliverable location that can significantly contribute to the Borough's housing needs and should be prioritized for residential development. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | CPRE London opposes the development of Green Belt land at Hadley Wood (SA RUR.02), emphasising its significance to the Metropolitan Green Belt and arguing that Enfield has enough brownfield land and existing major sites like Meridian Water for housing development. They note that this protected Green Belt countryside is designated as an Enfield Chase Area of Special Character within the current statutory Development Plan and should not be included as a site allocation. | Comments noted. The Council acknowledges CPRE London's concerns regarding the development of Green Belt land at Hadley Wood (SA RUR.02). The ELP Spatial Strategy and Overall Approach Topic Paper outlines the necessity of meeting housing demands in Enfield, emphasizing that brownfield sites alone are insufficient. The Exceptional Circumstances Topic Paper provides detailed justification for Green Belt release, highlighting the importance of addressing housing shortages comprehensively. The Enfield Housing Topic Paper and Site Allocation Topic Paper further explain the rigorous assessment process ensuring developments balance housing needs with environmental protection, maintaining the character and significance of areas like Hadley Wood. | No | 01726 | CPRE London |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Hadley Wood Neighbourhood Planning Forum (HWNPF) consider Site RUR.02 as an isolated location with very poor public transport accessibility (PTAL score of 1b) and limited local amenities. The Forum argues that the site is not suitable for sustainable development, as it would increase car dependency and exacerbate existing infrastructure challenges without any planned improvements. The HWNPF raises concerns about the increased surface water flood risk that could result from developing the site, particularly to the nearby railway line, which is in a flood zone. They also argue that developing this Green Belt site would contradict the Council's Climate Action Plan by destroying valuable carbon-sequestering grassland. The HWNPF criticizes the Council for not fully exploring brownfield sites and underutilized land before considering Green Belt release. They provide examples of several brownfield sites that could potentially accommodate thousands of homes, which have been overlooked or dismissed by the Council. | Comments noted. The ELP Spatial Strategy emphasizes the importance of sustainable development, integrating new housing with existing infrastructure and ensuring developments are located where they can benefit from existing or planned transport and services. It argues that the selected Green Belt sites, despite lower PTAL scores, are strategically located to support sustainable growth. The Site Allocation Topic Paper discusses the sustainability of each site, including the potential for enhancing local infrastructure. For Site RUR.02, the paper mentions potential improvements in pedestrian and cycling routes and argues that the site's proximity to Hadley Wood Station provides a basis for its inclusion in the plan. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Hadley Wood Neighbourhood Planning Forum (HWNPF) strongly recommends that the proposed allocation of Site RUR.02 for housing be deleted from the Local Plan. They argue that the site does not meet the criteria for sustainable development and that its release from the Green Belt is not justified by any exceptional circumstances. The Forum urges the Council to fully explore and utilize brownfield sites and underutilized land before considering any Green Belt release. They provide a list of 11 potential brownfield sites that could collectively deliver up to 3,500 housing units, which they believe should be prioritized over Green Belt development. The HWNPF calls for more effective and proportionate engagement with local communities and planning bodies to ensure that the Local Plan is sound and legally compliant. They stress the need for the Council to take the views and representations of local residents and neighborhood planning bodies seriously in the planning process. | Comments noted. While the strategy is committed to protecting as much Green Belt land as possible, it recognises that limited Green Belt release is necessary for achieving housing targets. The Council argues that the modifications proposed by HWNPF, such as focusing solely on brownfield sites, would not sufficiently meet the borough's housing needs.<br>The Site Allocation Topic Paper suggests that while alternative sites were considered, they were found insufficient to meet the overall housing requirement. The Council maintains that the exceptional circumstances for the Green Belt releases, including Site RUR.02, are justified and necessary for the sustainable development of Enfield. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | Troy Planning + Design on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood Forum (HWNF) criticizes the allocation, pointing out the site's poor accessibility (PTAL rating of 0-1) and limited local infrastructure. They argue that the development would lead to car dependency, contradicting the Council's sustainability goals. | Comments noted. The Integrated Impact Assessment (IIA) assesses the sustainability of each site, including RUR.02, and recognizes the challenges posed by its low PTAL score. However, the assessment also notes that potential infrastructure improvements and the development's integration with the surrounding area can help mitigate these issues. The Spatial Strategy topic paper outlines that planned developments are designed to enhance sustainability over time, with future infrastructure improvements considered as part of the planning process. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |

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| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | Troy Planning + Design on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood Forum (HWNF) recommends that Site RUR.02 be removed from the Local Plan due to its strong Green Belt performance, the lack of exceptional circumstances, and the minor contribution it makes to housing targets. The HWNF also suggests removing the reference to a housing requirement of 160 homes for the Hadley Wood Neighbourhood Plan area from the Local Plan, arguing that this figure is not justified or evidenced. The representation urges the Council to reexamine the allocation of other sites and prioritize brownfield and underutilized land before considering any changes to Green Belt boundaries. | Comments noted. The Local Plan reflects a balanced approach to meeting housing needs, protecting the environment, and ensuring sustainable development. The decisions regarding Green Belt sites were not made lightly but were the result of thorough analysis and consultation. The Council will continue engaging with the HWNPF to address their specific concerns through a statement of common ground. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The document titled "Landscape & Green Belt Appraisal" prepared on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum. It assesses the potential impacts of a proposed development site located between Camlet Way and Crescent West, Hadley Wood, on the landscape and the Green Belt. The appraisal finds that the development would have substantial adverse visual effects on the local landscape. It emphasizes that the site is part of an attractive, rural landscape that contributes significantly to the character of the area. The presence of the development would starkly contrast with the existing leafy, low-density urban edge and would disrupt the overall rural character. The site is currently designated as Green Belt and is part of an Area of Special Character (AOSC). The appraisal highlights that the site strongly contributes to the purposes of the Green Belt, particularly in preventing urban sprawl, safeguarding the countryside from encroachment, and preserving the setting and special character of the area. The landscape around the site is described as having high sensitivity to development. The development would introduce a prominent new characteristic feature that contrasts with the existing rural environment, leading to a substantial adverse impact on both landscape and visual amenity. The appraisal references the Council's Green Belt and Metropolitan Open Land Study, which concludes that the release of this land from the Green Belt would result in "High" to "Very High" harm. The study suggests that the site's contribution to the Green Belt is significant, and its release for development would be detrimental to the overall integrity of the Green Belt in this area. The appraisal strongly recommends against the allocation of this site for development in the Local Plan. It argues that the landscape and visual impacts, coupled with the harm to the Green Belt, outweigh the potential benefits of housing development on this site. It suggests that the site should retain its Green Belt status and remain protected as part of an Area of Special Character, ensuring that the rural landscape and visual amenity of the area are preserved. The report implicitly recommends that the Council should consider alternative sites for development that do not have such a significant impact on valued landscapes or the Green Belt. In summary, the document provides a detailed argument against the proposed development on this site, focusing on the adverse effects on the landscape and the importance of maintaining the Green Belt designation. It advocates for the preservation of the site as a key part of the local rural character and a significant contributor to the Green Belt's integrity. | Comments noted. The Enfield Local Plan acknowledges the importance of the Green Belt but highlights that limited release is necessary to meet the borough's significant housing needs. The strategy emphasizes that any Green Belt release, including the site between Camlet Way and Crescent West, is based on a thorough assessment of exceptional circumstances as required by the National Planning Policy Framework (NPPF).<br>The Integrated Impact Assessment (IIA) considers environmental, social, and economic impacts and concludes that while the Green Belt site has value, the broader benefits of housing development in meeting strategic needs outweigh the potential negative impacts. Mitigation measures, including improvements in green infrastructure, are proposed to minimize harm. The ELP Spatial Strategy Topic Paper outlines that development on this site will be supported by improvements to local infrastructure and services. This includes enhancing public transport links and ensuring that any development is integrated with the surrounding area to promote sustainable growth. The IIA Findings includes an assessment of sustainability indicators, noting that while the site currently has lower Public Transport Accessibility Levels (PTALs), planned infrastructure upgrades will enhance its sustainability. The assessment also considers the need to balance housing delivery with environmental protection, leading to the conclusion that the site can be developed sustainably with appropriate safeguards. The IIA Assessment acknowledges the potential adverse visual impacts of development on this site but suggests that these can be mitigated through careful design and landscaping. The plan includes provisions to preserve key views and maintain the character of the surrounding area, even as the site is developed for housing. The ELP Spatial Strategy Topic Paper reaffirms that the visual and landscape impacts were thoroughly considered in the site selection process. The need for housing, coupled with mitigation measures, justifies the allocation of the site despite its current landscape value.<br>The Council can argue that the allocation of the site between Camlet Way and Crescent West is essential to meet housing needs while adhering to sustainability principles. The development will be supported by infrastructure improvements, and the visual impact will be carefully managed through design and landscaping. Acknowledge the concerns raised in the Landscape & Green Belt Appraisal and the Council can commit to implementing mitigation measures that protect the landscape and visual character of the area. This includes maintaining green buffers, enhancing public access to green spaces, and integrating new development sensitively into the existing urban fabric. Overall, the decision to allocate this site for development is justified by a comprehensive assessment process that balances the need for housing with the protection of the environment and the integrity of the Green Belt. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The document titled Sustainability Audit of RUR.02: Land between Camlet Way and Crescent West" by the Hadley Wood Neighbourhood Planning Forum evaluates the sustainability of the proposed residential development on Green Belt land in Hadley Wood, Enfield. The audit finds that the area lacks essential social infrastructure, such as healthcare, education, and community facilities, within a walkable distance of the proposed development site. Schools are operating at or near capacity, and the nearest healthcare facilities are not within reasonable walking distance. The site has a very low Public Transport Accessibility Level | Comments noted. The Spatial Strategy and Overall Approach topic paper for the plan outlines that the need for new housing in Enfield necessitates careful consideration of Green Belt releases under exceptional circumstances. Site RUR.02 was selected because it provides a strategic opportunity to meet housing demands while balancing environmental and infrastructure considerations. The Integrated Impact Assessment (IIA) acknowledges the infrastructure limitations at RUR.02 but suggests that these can be mitigated through planned improvements in public transport, healthcare, and education. The assessment concludes that the | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |

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| | (PTAL) of 1, indicating poor access to public transport. This would likely increase car dependency, contributing to higher carbon emissions and contradicting Enfield's sustainability goals. Developing the site would result in the loss of Green Belt land, leading to negative effects on biodiversity, landscape, and climate change adaptation. The audit argues that the removal of undeveloped grassland would exacerbate flood risks and harm the local environment. The audit claims that the proposed development contradicts both national and local planning policies, particularly those emphasizing the need for sustainable development and reducing reliance on private car use. The area is also identified as having significant barriers to housing and services, further questioning the suitability of the site for development. The audit disagrees with the Integrated Impact Assessment's (IIA) scores for the site, arguing that the impacts on transport, air pollution, services, biodiversity, and landscape should be rated more negatively due to the area's existing shortcomings. The audit concludes that the site is not a sustainable location for development and should be removed from Enfield's Local Plan. The lack of infrastructure, poor transport links, and significant environmental impact make the site unsuitable for the proposed 160 residential units. The audit also recommends revising related policies in the Local Plan, such as those concerning tall buildings and smaller housing developments, to ensure they are only applied to areas with proven sustainable infrastructure and transport links. Overall, the document argues that the proposed development on the RUR.02 site would not meet the sustainability criteria required by planning policies and would have detrimental effects on the local environment and community infrastructure. | benefits of housing provision outweigh the negative impacts, particularly with proper mitigation strategies. The Site Allocation Topic Paper justifies the selection of RUR.02 by emphasizing that the site aligns with the broader spatial strategy, including the promotion of sustainable growth in locations that are capable of being integrated into the existing urban fabric over time.<br>The IIA and Spatial Strategy topic paper acnknowledges while the PTAL rating for RUR.02 is low, the strategy includes planned enhancements to public transport accessibility. The proposed development will be designed to reduce car dependency by encouraging the use of public transport and improving walkability.<br>The Site Allocation topic paper and IIA recognize the environmental sensitivity of the site, but they argue that the development can achieve a net gain in biodiversity through careful planning and implementation of green infrastructure. The Green Belt review concluded that the site's release is justified due to its contribution to meeting critical housing needs. The inclusion of RUR.02 in the Local Plan is supported by a comprehensive assessment that balances the urgent need for housing with the site's environmental and infrastructure challenges. The plan includes strategies to mitigate negative impacts and enhance sustainability, making the development a justified component of Enfield's long-term growth strategy, emphasizing the balanced approach taken to meet housing needs while addressing the site's limitations. | | | |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The document titled "Walkability Index Hadley Wood" assesses the walkability of the Hadley Wood area. The report reveals that Hadley Wood has a low average Walkability Index score of 7.8, which is significantly below the borough average of 24 and the London average of 60. Factors contributing to this low score include disconnected streets, large urban blocks increasing walking distances, and a narrow mix of land uses that limit reasons for walking locally. The report suggests enhancing street connectivity to improve walkability. Introducing a greater mix of land uses could provide more local destinations within walking distance. Smaller urban blocks and better-connected street networks could improve the walkability score, making the area more conducive to walking as a primary mode of transport. The report recognises the need for targeted urban design improvements to promote walking and reduce car dependency in Hadley Wood. | Comments noted. The Enfield Local Plan emphasizes the importance of sustainable development, which includes improving walkability through better urban design, infrastructure investments, and land use planning. The Plan aims to enhance connectivity, increase the mix of land uses, and reduce car dependency, particularly in areas like Hadley Wood. The Integrated Impact Assessment (IIA) evaluates the environmental and social impacts of proposed developments. The assessment recognises that improving walkability in Hadley Wood aligns with the broader goals of reducing carbon emissions, promoting public health, and enhancing accessibility to essential services. The Enfield Local Plan's strategies and assessments support the need for urban design improvements in Hadley Wood to increase walkability. The Plan's emphasis on sustainable growth and infrastructure enhancements directly addresses the shortcomings highlighted in the Walkability Index, ensuring that future developments in Hadley Wood will contribute to a more connected and pedestrian-friendly environment, which seeks to balance growth with sustainability, thereby justifying the steps to improve Hadley Wood's walkability. | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The document titled "Hadley Wood Heritage and Character Assessment" provides a detailed evaluation of the heritage and character of the Hadley Wood area in Enfield, emphasizing its historical development, architectural styles, and landscape features. The assessment highlights the area's unique characteristics, such as its verdant backdrop, spacious green streets, and high-quality architecture. It also identifies key issues threatening the area's character, including unsympathetic developments and the erosion of traditional urban forms. Hadley Wood has a rich historical background, with developments primarily from the late 19th and early 20th centuries, characterized by detached houses with significant architectural detail. The area includes seven listed buildings and a conservation area. The area's architecture is noted for its high-quality design, with a mixture of suburban styles, large plots, and mature trees contributing to a distinctive, verdant character. The use of traditional materials and attention to architectural detailing is prominent, particularly in the conservation area. The assessment emphasizes the importance of green spaces, including private gardens, public parks, and natural reserves like the Covert Way Nature Reserve. These areas contribute to the area's rural feel despite its proximity to London. Modern developments, including mansion-style houses and flats, are identified as threats to the traditional character of Hadley Wood. The increase in hard surfaces, loss of vegetation, and use of low-quality | Comments noted. The Spatial Strategy and Overall Approach topic paper for the Enfield Local Plan emphasizes the importance of preserving the unique heritage and character of areas like Hadley Wood. The plan encourages development that respects the existing architectural styles, urban structure, and the surrounding natural environment. The suite of Design and Character Evidence Base outlines guidelines for maintaining the character of Enfield's distinct neighbourhoods. In Hadley Wood, this includes ensuring new developments are in harmony with existing heritage assets and do not detract from the area's historical significance. The Integrated Impact Assessment (IIA) considers the environmental and social impacts of development. It supports maintaining green spaces and integrating new development in a way that enhances rather than detracts from the area's character. The IIA aligns with the Heritage and Character Assessment's recommendations to protect green infrastructure and manage surface water sustainably. The plan supports initiatives like the enhancement of public spaces, improvement of pedestrian and cycling routes, and protection of historical assets. These align with the character management principles outlined in the Heritage and Character Assessment, emphasizing that development should contribute to the community's quality of life without compromising its historical and architectural integrity. Overall, the Enfield Local Plan's spatial strategy, integrated impact | No | 01311 | Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum |

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| | modern materials are eroding the area's distinctiveness. New developments should respect the existing urban structure, maintain the traditional footprint, and ensure that new buildings are consistent in scale, form, and materials with the surrounding architecture. Protect and enhance existing green spaces, maintain street trees, and limit the loss of private garden space. Developments should minimize surface water runoff and consider the ecological value of the area. Implement projects like surface water management strategies, enhancement of public open spaces, and improvements to pedestrian and cycling routes. These initiatives could be funded through mechanisms like the Community Infrastructure Levy (CIL) or Section 106 (S106) contributions. Encourage the preservation of historical buildings and promote new developments that reflect the local character and history of Hadley Wood, ensuring that modern interventions are sympathetic to the area's heritage. This assessment provides a comprehensive guide to managing change in Hadley Wood, emphasizing the need to protect its historical and architectural significance while allowing for sustainable development that respects the area's unique character. | assessments, and design guidelines support the careful management of change in Hadley Wood. The Plan justifies preserving the area's heritage while allowing for sustainable development that respects and enhances the existing character, ensuring that new developments are sympathetic to the historical and architectural context of Hadley Wood. | | | |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Hadley Wood Neighbourhood Planning Forum states that site RUR.02 is potentially the site of the 1471 Battle of Barnet or at least contiguous with it, affecting its archaeological significance. They argue that the site's historical importance has not been adequately considered in the Integrated Impact Assessment, referencing further details in a representation by Barnet Museum, approved by its Chair, John Hall. | Comments noted. The Council acknowledges the importance of this site and its archaeological implications. The Site Allocation Topic Paper comprehensively assesses all proposed sites, including their historical and archaeological significance. The Council ensures that any development on RUR.02 will be carefully managed to preserve its historical context. | No | 01669 | Hadley Wood Neighbourhood Planning Forum |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The letter from Barnet Museum and Local History Society, dated May 16th, 2024, expresses concerns regarding the draft Enfield Plan, specifically objecting to the release of Green Belt land in site reference RUR.02. The site in question is potentially related to the historic Battle of Barnet, which was fought in 1471 during the Wars of the Roses. The museum's chairman, John Hall, highlights several points to support their objection:<br><br>Studies by the Battlefield Trust and others suggest that the site is related to the battlefield.<br>Barnet Museum believes the traditional battlefield location, as recorded by English Heritage, is likely accurate and recommends further research.<br>There are considerations for establishing a battlefield visitor center in Barnet, which would include guided battlefield walks covering the site.<br>The topography and open character of the site are consistent with historical descriptions of the battlefield landscape.<br>Recommendations: Barnet Museum urges that the site should be protected due to its special heritage and potential archaeological value, emphasizing its historical significance as part of the Battle of Barnet. | Comments noted. The Site Allocation Topic Paper for Regulation 19 justifies Enfield's decision to release certain Green Belt areas based on exceptional circumstances and strategic planning needs. The Council acknowledges the historical significance of sites and follows the Sustainability Appraisal guidelines that evaluate the cultural and heritage impacts of any development. The plan also integrates heritage and archaeological assessments to ensure that areas with historical importance, like the Battle of Barnet, are given appropriate protection. These assessments would be in place before any development begins to ensure heritage sites are preserved while balancing housing needs and sustainability goals. Additionally, Enfield's Integrated Impact Assessment (IIA) recognizes the importance of protecting historically significant sites while also addressing pressing housing needs and urban development demands. The IIA framework is designed to evaluate and mitigate potential impacts on heritage sites, making sure that any development around the Battle of Barnet site would be carefully considered to avoid disruption. While the Council is moving forward with its plans, measures are in place to safeguard heritage assets, aligning development with both housing goals and cultural preservation. | No | 01669 | Hadley Wood Neighbourhood Planning Forum |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Hadley Wood Neighbourhood Planning Forum opposes the proposed release of Green Belt site RUR.02, arguing that it lacks evidence and justification for exceptional circumstances. They highlight that the site does not meet criteria for release, performs highly as Green Belt, and would cause significant harm if developed. Concerns include poor public transport accessibility, lack of local services, and high flood risk. The site is part of a valued landscape with historical, ecological, and scenic importance. The Forum criticizes the exclusion of this site from the Hadley Wood Neighbourhood Plan, which was supported by the community, and faults the Local Planning Authority for not properly considering objections or providing a robust analysis of the evidence. They conclude that RUR.02 should retain its Green Belt designation. | Comments noted. The justification for releasing RUR.02 is based on a thorough and evidence-based approach detailed in several documents: 1) ELP Spatial Strategy and Overall Approach Topic Paper: This document outlines the comprehensive strategy behind the Local Plan and the exceptional circumstances necessitating Green Belt release. It demonstrates the strategic importance of site RUR.02 in meeting Enfield's housing and development needs. 2) Exceptional Circumstances Topic Paper: This paper provides a robust justification for the exceptional circumstances required for Green Belt release. It includes an analysis of the need for housing and the lack of viable alternatives within existing urban areas. 3) Site Allocation Topic Paper: This paper includes site-specific assessments, detailing the suitability and planning considerations for each proposed site, including RUR.02. It considers factors such as public transport accessibility, local services, flood risk, and the ecological and historical significance of the site. The Council has followed a detailed and transparent process, incorporating feedback and ensuring all criteria and evidence support the inclusion of RUR.02 in the Local Plan. | No | 01669 | Hadley Wood Neighbourhood Planning Forum |

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| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | Enfield Road Watch objects to SA RUR.02: Hadley Wood (Land Between Camlet Way and Crescent Way) because the area is currently Green Belt countryside and designated as an Enfield Chase Area of Special Character in the existing Development Plan. Additionally, the proposed development would negatively impact the setting of the Conservation Areas at Hadley Wood and Monken Hadley (Barnet). | Comments noted. The Enfield Housing Topic Paper (2024) and the Site Allocation Topic Paper for emphasizes that the Council has thoroughly explored brownfield sites first, but some Green Belt release is necessary to meet housing needs. The ELP Spatial Strategy recognises the balanced approach taken to address housing demands while preserving essential green spaces where possible. | No | 01687 | Enfield Road Watch |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Enfield Society's response highlights significant concerns about the proposed development of 160 homes between Hadley Wood and Monken Hadley Conservation Areas. They argue the development would harm the views from Crescent Road, breach woodland fringes, and intrude on rural views. The site is historically significant as part of Enfield Chase and could be part of the Battle of Barnet battlefield. They emphasize the area's protection under London Plan policies and the Hadley Wood Neighbourhood Plan, arguing the development is inconsistent with these protections and would disrespect local democratic wishes. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **RUR.02: Land between Camlet Way and Crescent West, Hadley Wood** | The Barnet Society expresses concern over the potential loss of this key part of the Monken Mead Brook valley, which is shared by Enfield, Barnet, and Hertsmere. They argue that the loss of Enfield's meadows would negatively impact the landscape value of the entire area. Additionally, they note that there seems to have been no consultation with Barnet or Hertsmere regarding this decision. The Barnet Society suggests that the site should not be designated for housing and should retain its Green Belt status to preserve the broader landscape shared by the three boroughs. They recommend that Enfield Council engage in consultation with Barnet and Hertsmere before making decisions that could affect shared landscapes.<br>Their recommendations aim to ensure the preservation of the Green Belt and the collaborative management of the shared landscape. | Comments noted. The Local Plan emphasizes the necessity of releasing some Green Belt land to meet Enfield's significant housing needs. This decision is based on a thorough analysis that considers the limited availability of alternative sites within urban areas. The Plan outlines that the decision to allocate SA RUR.02 was not made lightly and is justified by exceptional circumstances, such as the need to provide sufficient housing while balancing environmental concerns. The Integrated Impact Assessment (IIA) assesses the environmental and social impacts of the proposed developments, including the cross-borough implications. It ensures that all potential impacts are considered, and any necessary mitigation strategies are implemented to preserve the broader landscape. The Local Plan includes a robust consultation process, and cross-borough consultations explicitly detailed in the Duty to Cooperate statement. While the concerns regarding the Green Belt and landscape preservation are valid, the Enfield Local Plan's strategy is justified by the need to meet housing demands under exceptional circumstances. The Plan ensures that the environmental and cross-borough impacts are carefully managed, aligning with broader strategic goals for sustainable development in the region. | No | 01817 | The Barnet Society |
| **SA2.2: Heritage House** | TfL welcomes the requirement for the development to reduce on-site car parking. They recommend that the reduction should align car parking with the London Plan maximum standards for a site with a PTAL of 3-4. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA2.2: Heritage House** | For site SA2.2, Thames Water does not foresee any infrastructure concerns related to the water supply network for the proposed development. However, it is recommended that developers and the Local Planning Authority engage with Thames Water early on to discuss the phasing of the development. For further details, developers should contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or by mail at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.2: Heritage House** | For Site SA2.2, Thames Water does not foresee infrastructure concerns regarding wastewater networks for the proposed development. However, early engagement between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. Developers should contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or by mail at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **SA2.2: Heritage House** | BL Logistics Investment Limited (British Land) supports Draft Policy SA2.2 for the redevelopment of the site to deliver a minimum of 22,120 sqm of net additional employment floorspace (Use Classes E(g)iii, B2, or B8). The current site provides 20,306 sqm, which should be the minimum benchmark under the policy, with anything up to 42,426 sqm, as per planning permission ref. 23/00824/FUL, being acceptable to protect and intensify the Strategic Industrial Location (SIL). | Comments noted. | No | 02011 | BL Logistics Investment Limited (British Land) |
| **SA2.2: Heritage House** | BL Logistics Investment Limited (British Land) agrees with the encouragement of innovative multi-storey employment development but suggests that Policy SA2.2 should also support single-storey development, as long as there is a net uplift in existing floorspace, to allow for market variations throughout the plan period. This approach aligns with London Plan Policies E4, E5, and E7, ensuring flexibility and promoting employment space intensification within SIL. | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **SA2.2: Heritage House** | BL Logistics Investment Limited (British Land) suggests SA2.2 aknowledge that intensification can have many forms such as the introduction of small units, basements mezzanines and basements. Furthermore intensification of industrial processess that can create greater benefits. | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **SA2.2: Heritage House** | BL Logistics Investment Limited (British Land) suggests minor changes to SA2.2 design principles wording around cycle route delviery, SME uses and green roofs / PVs to allow greater flexiblity. | Comments noted. Further engagement and statement of common ground to consider how to resolve issue. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **SA2.2: Heritage House** | BL Logistics Investment Limited (British Land) supports the land use principles set out in draft site allocation Policy SA2.2 - Heritage House, and the identification of the site for industrial redevelopment under Use Classes E(g)iii, B2, and B8, subject to the necessary amendments detailed in these representations. British Land appreciates that Draft Policy SA2.2 includes the correct estimated floorspace capacities as per planning permission ref. 23/00824/FUL. Additionally, it is noted that Heritage House is identified in the Council's Employment Topic Paper (March 2024), a key evidence base document, as "the only contemporary instance of an intensified format with granted planning consent in Enfield."<br><br>A tracked changes version of Policy SA2.2, incorporating detailed comments, has been included at Appendix 3. | The Council appreciates the support from BL Logistics Investment Limited (British Land) regarding the land use principles in draft site allocation Policy SA2.2 - Heritage House. The council acknowledge the identification of the site for industrial redevelopment and the inclusion of correct estimated floorspace capacities. The recognition of Heritage House as a key instance of an intensified format with granted planning consent in Enfield is noted. The council welcome further engagement and the development of a statement of common ground to address any necessary amendments and resolve issues collaboratively. | Yes | 02011 | BL Logistics Investment Limited (British Land) |
| **SA2.7: Crown Road Lorry Park** | TfL notes the requirement for the development to provide limited parking but suggests it should be amended to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA2.7: Crown Road Lorry Park** | Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.7: Crown Road Lorry Park** | Thames Water does not anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, early coordination between the developer and the Local Planning Authority with Thames Water is recommended to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **SA2.7: Crown Road Lorry Park** | LBESPS supports the allocation of Crown Road Lorry Park (SA2.7) for additional employment floorspace, proposing 4,530 sqm of industrial and related uses. They recommend a flexible approach in design, suggesting the floorspace figure be approximate and removing the reference to "stacked industrial units" due to viability and market attractiveness concerns. They advise reconsidering the 65% plot ratio and emphasize the need for detailed design and feasibility studies. The site is seen as a sustainable, accessible brownfield location, with a development timeframe of up to 10 years, and should be prioritized for development. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **SA2.8: Land and buildings north of Lincoln Road** | TfL welcomes the requirement for the development to contribute towards bus service prioritisation and associated traffic management measures along the A1010. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA2.8: Land and buildings north of Lincoln Road** | For site SA2.8, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed development. However, they recommend that the Developer and the Local Planning Authority liaise with Thames Water early to discuss the development's phasing. Developers should contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or by mail at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.8: Land and buildings north of Lincoln Road** | Fpr site SA2.8, Thames Water indicates that the proposed development scale will likely require wastewater network upgrades. They recommend early liaison between the Developer, Local Planning Authority, and Thames Water to agree on a housing and infrastructure phasing plan. This plan should determine existing network capacity and necessary phasing to ensure infrastructure upgrades are completed before development occupation. Failing to do so may result in planning conditions at the application stage. Developers can request network infrastructure information from Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA2.8: Land and buildings north of Lincoln Road** | Goodman UK Limited supports the redevelopment of a site in a Strategic Industrial Location (SIL) due to its current underutilization and the need for modern industrial space. They have a Planning Performance Agreement with the Local Planning Authority to outline flexible development parameters for the site, aiming for delivery by 2027-28. Goodman confirms the site is available and suitable, with initial feasibility studies exploring various development options. They advocate for the site's allocation but request modifications to address inconsistencies in the Draft Site Allocation, particularly concerning unrealistic intensification requirements. Goodman suggests removing rigid minimum intensification levels in favor of flexible approaches that reflect market realities and site-specific factors. This would align with broader policy objectives and support viable, attractive industrial development. | Comments noted. The Council is committed to working collaboratively with Goodman UK Limited and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01874 | Goodman UK Limited |
| **SA5.7: Ravenside Retail Park** | TfL welcomes the requirement to contribute towards increasing direct and frequent bus services to improve connectivity to and from industrial areas, emphasising that any enhanced bus services must be economically viable based on expected trip generation. They are currently updating options for bus services to Meridian Water phases 1 and 2 based on the latest costs. TfL notes the requirement for limited parking but suggests it should be amended to state that parking must be minimised to ensure consistency with the London Plan. They support streetscape improvements but emphasize that any proposals affecting the North Circular Road or its frontage should be agreed with TfL, with no direct vehicle access (for parking or servicing) from the North Circular Road. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA5.7: Ravenside Retail Park** | Based on available data, the Environment Agency identifies that several sites, including Site SA5.6, are either partly or wholly within Flood Zones 2 or 3. The EA | The council welcomes the feedback and for highlighting the flood risk data for Site SA5.6. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation. The Council is | Yes | 01926 | Environment Agency |

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| | recomends that Site SA5.6 specifically be classified within Flood Zone 2 and Flood Zone 3 and Flood Zone 3b. | committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | | | |
| **SA5.7: Ravenside Retail Park** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA5.7: Ravenside Retail Park as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA5.7 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA5.7, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **SA5.7: Ravenside Retail Park** | The Environment Agency notes that development on historic landfills, such as Site SA5.7: Ravenside Retail Park, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **SA5.7: Ravenside Retail Park** | Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.7: Ravenside Retail Park** | Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.7: Ravenside Retail Park** | Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **SA5.7: Ravenside Retail Park** | Prologis suggests changes to Policy SA 5.7 for Ravenside Retail Park to support multi-level logistics development. They propose removing the new pedestrian route through the site, as it conflicts with vehicle movements, and focusing pedestrian paths on the eastern end. Prologis also objects to the proposed 10-meter buffer zone along the Lee Navigation, advocating for an 8-meter zone. They recommend amending the site allocation map and design principles to reflect these changes, ensuring the site's development effectiveness. | The council appreciates Prologis' support and acknowledges the concerns regarding the wording of PL5. The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01905 | Prologis for Ravenside Retail Park |

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| **SA5.7: Ravenside Retail Park** | Prologis supports the development of a multistorey logistics hub at Ravenside Retail Park (RRP) but highlights inconsistencies in the draft policy SA 5.7 regarding industrial floorspace figures, which are listed as both 21,700 sqm and 32,500 sqm. They recommend clarifying this to avoid limiting the site's potential. Prologis also notes that ramps and enclosed yards necessary for the hub should be excluded from the floorspace calculation. They suggest amending the policy to state a minimum of 32,500 sqm to facilitate optimal development. | The council appreciates Prologis' support and acknowledges the concerns regarding the wording of PL5. The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01905 | Prologis for Ravenside Retail Park |
| **SA5.7: Ravenside Retail Park** | Prologis objects to certain design principles in the draft policy SA 5.7 for Ravenside Retail Park, arguing they hinder the site's potential for a multi-level logistics hub. They highlight conflicts with requirements for naturalizing Pymmes Brook, setback distances, yard and loading space locations, and limited parking. Prologis contends these elements are not justified or effective, potentially impeding the operational needs of logistics developments. They suggest amending the policy to provide more flexibility, promoting active travel while accommodating the practical requirements of a multi-level logistics site. | The council appreciates Prologis' support and acknowledges the concerns regarding the wording of PL5. The Council will continue to engage with Prologis and prepare a bespoke area-wide Meridian Water statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01905 | Prologis for Ravenside Retail Park |
| **SA5.8: Kenninghall Metals and Waste** | TfL welcomes the requirement to contribute towards increasing direct and frequent bus services to improve connectivity to and from the site. They emphasise that any enhanced bus services must be economically viable based on expected trip generation. However, they note that it may be difficult to provide a viable bus service due to the lack of guaranteed trips and limited frontages in the area. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA5.8: Kenninghall Metals and Waste** | Based on available data, the Environment Agency identifies that several sites, including Site SA5.8, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site SA5.8 specifically be classified within Flood Zone 2 and Flood Zone 3. | The council welcomes the feedback and for highlighting the flood risk data for Site SA5.8. The Council will review the classification of the site, considering the available data and the Environment Agency's recommendation. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and reconsider site allocations where necessary to ensure compliance with national policy. We greatly appreciate your input and will ensure that any necessary adjustments are made to accurately reflect the site's flood risk in the Local Plan. | Yes | 01926 | Environment Agency |
| **SA5.8: Kenninghall Metals and Waste** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site SA5.8: Kenninghall Metals and Waste as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site SA5.8 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including SA5.8, adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **URB.32: Claverings Industrial Estate** | Based on available data, the Environment Agency identifies that several sites, including Site URB.32, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site URB.32 specifically be classified within Flood Zone 2. | The Council welcomes the EA's comments regarding Site URB.30 and its classification within Flood Zone 2. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **URB.32: Claverings Industrial Estate** | Turley on behalf of Danescroft (FRELD Claverings) LLP, a property development company, recently acquired the 2.28ha Claverings Industrial Estate, which is allocated for industrial and logistics-led redevelopment due to its poor-quality buildings needing regeneration. While Danescroft supports the redevelopment | Comments noted. The Council appreciates Danescroft's support for the redevelopment of Claverings Industrial Estate and acknowledges the concerns regarding design principles. The Site Allocation Topic Paper for Regulation 19 and the Enfield Employment Topic Paper emphasize aligning site allocations with | No | 01747 | Danescroft (FRELD Claverings) LLP |

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| | principle, they identify conflicts with the Council's design principles, citing boundary inconsistencies, level differences, and unrealistic intensification targets. They suggest measuring intensification by volumetric capacity and operational yard space rather than floorspace alone and recommend modifications to the draft site allocation masterplan. Additionally, Danescroft advocates for including a full spectrum of acceptable uses in LSIS, as per London Plan Policy E4(A), and emphasizes a flexible approach to industrial intensification. | strategic growth objectives and market demands. The Council will address boundary inconsistencies and level differences and consider measuring intensification by volumetric capacity and operational yard space. The Council will enter into a Statement of Common Ground with Danescroft to address these concerns and collaboratively explore viable solutions. | | | |
| **URB.32: Claverings Industrial Estate** | Turley on behalf of Danescroft (FRELD Claverings) LLP supports the principle of redeveloping the site as identified in the Draft Site Allocation, they find it necessary to comment on and object to certain detailed aspects to ensure effective delivery. Modifications to Draft Policies E1, E2, and E6 are also proposed. | Noted. The Council will enter into a Statement of Common Ground with Danescroft to address these concerns and collaboratively explore viable solutions. | No | 01747 | Danescroft (FRELD Claverings) LLP |
| **URB.28: Land and buildings south east of Stockingswater Lane** | TfL notes the requirement for the development to provide limited parking but suggests it should be amended to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.28: Land and buildings south east of Stockingswater Lane** | Based on available data, the Environment Agency identifies that several sites, including Site URB.28, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site URB.28 specifically be classified within Flood Zone 2 and Flood Zone 3 and 3b. Appendix C states this is FZ1 (page 524). This is incorrect. | The Council welcomes the EA's comments regarding Site URB.28 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **URB.28: Land and buildings south east of Stockingswater Lane** | For site URB.28, Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure. Early liaison between the developer, the Local Planning Authority, and Thames Water is recommended to agree on a housing phasing plan. This will ensure necessary infrastructure upgrades are delivered ahead of development occupation, avoiding the need for planning conditions at the application stage. Developers can obtain information on network infrastructure via Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.28: Land and buildings south east of Stockingswater Lane** | For site URB.28, Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network information through Thames Water's website: Thames Water Planning Your Development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.28: Land and buildings south east of Stockingswater Lane** | For site URB.28, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.28: Land and buildings south east of** | ADL welcomes the inclusion of site allocation URB.28 (Land and Buildings South East of Stockingswater Lane) in Policy E1: Employment and Growth, with an estimated additional capacity of 80,753 sqm. They support the focus on | The council appreciate ADL's support for the inclusion of site allocation URB.28 (Land and Buildings South East of Stockingswater Lane) within Policy E1: Employment and Growth, recognizing its potential to add significant industrial | No | 01682 | Areli Developments Ltd. ('ADL') on |

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| **Stockingswater Lane** | intensifying industrial land to boost employment. However, ADL proposes clarifying that this capacity is an estimate and not a limit, allowing for higher capacity if an appropriate design solution is found. They also recommend updating Policy E1 to reflect that 80,753 sqm is a minimum capacity. | capacity. As justified by the Site Allocation Topic Paper and the Employment Topic Paper, the focus on industrial intensification is crucial for boosting employment. We acknowledge ADL's suggestion to clarify that the 80,753 sqm capacity is an estimate and not a limit. Therefore, the council will consider updating Policy E1 to reflect this capacity as a minimum, allowing for higher capacity if an appropriate design solution is found. Further engagement and a statement of common ground will be essential to ensure these adjustments align with Enfield's growth objectives. | | | behalf of the Landowner of Stockingswater Lane ('Landowner'). |
| **URB.28: Land and buildings south east of Stockingswater Lane** | ADL welcomes the inclusion of site allocation URB.28 but suggests several clarifications and amendments. They note that the identified green area on the map does not exist within the site boundary and propose integrating green areas across the site to ensure efficient building layouts and meet industrial and employment capacity goals. ADL argues that requiring active frontages around the site's circumference may limit building forms and industrial space intensification, suggesting instead the use of well-located amenity spaces, appropriate glazing, curated landscaping, and biodiversity. They recommend the land use section support interim uses like parking and loading areas to facilitate the site's industrial function, advocating for innovative multistorey development. ADL also proposes the policy prioritize industrial floorspace delivery while contributing to placemaking, with amendments including contributions to the Green Loop, Brimsdown Station improvements, and open space enhancements along the River Lee Navigation. For design principles, they suggest activation along Stockingswater Lane and the River Lee Navigation, streetscape improvements, pedestrian/cycle connections, access to the pedestrian river bridge, and supporting the Enfield Green Loop. These adjustments aim to balance industrial space intensification with broader community and environmental benefits. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with ADL to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01682 | Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). |
| **URB.29 Land to the south of Milmarsh Lane, Brimsdown Industrial Estate** | TfL welcomes the requirement to contribute towards more direct and frequent bus services along the A1055 to improve connectivity to and from industrial areas. They emphasise that any enhanced bus services must be economically viable based on expected trip generation and note the potential difficulty of providing viable bus services due to limited frontages in the area. Additionally, TfL notes the requirement for limited parking but suggests it should be amended to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.29 Land to the south of Milmarsh Lane, Brimsdown Industrial Estate** | Based on available data, the Environment Agency identifies that several sites, including Site URB.29, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site URB.28 specifically be classified within Flood Zone 2 and Flood Zone 3. Appendix C states this is FZ1 (page 526). This is incorrect. | The Council welcomes the EA's comments regarding Site URB.29 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **URB.29 Land to the south of Milmarsh Lane, Brimsdown Industrial Estate** | For site URB.29, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.29 Land to the south of Milmarsh Lane, Brimsdown Industrial Estate** | For site URB.29, Thames Water emphasizes that large-scale developments will likely need upgrades to the wastewater network. Developers and the Local Planning Authority should coordinate early with Thames Water to create a housing and infrastructure phasing plan. This plan will assess the current network capacity and determine necessary phasing to ensure that development does not exceed infrastructure capabilities. Early coordination helps avoid planning conditions that could delay project occupation. Developers can access detailed network | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| | information through Thames Water's website: Thames Water Planning Your Development. | | | | |
| **URB.29 Land to the south of Milmarsh Lane, Brimsdown Industrial Estate** | For site URB.29, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.33: 6 Morson Road** | TfL notes the requirement for the development to provide limited parking but suggests it should be amended to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.33: 6 Morson Road** | Based on available data, the Environment Agency identifies that several sites, including Site URB.33, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site URB.33 specifically be classified within Flood Zones 2 and 3. Appendix C states this is FZ1 (page 534). This is incorrect. | The Council welcomes the EA's comments regarding Site URB.33 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **URB.33: 6 Morson Road** | For site URB.33, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.33: 6 Morson Road** | For site URB.33, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.30: Montagu Industrial Estate** | TfL welcomes the requirement to contribute towards more direct and frequent bus services along the A1055 to improve connectivity to and from industrial areas. They emphasize that any enhanced bus services must be economically viable based on expected trip generation and note the potential difficulty due to limited frontages in the area. TfL also notes the requirement for limited parking but suggests amending it to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.30: Montagu Industrial Estate** | Based on available data, the Environment Agency identifies that several sites, including Site URB.30, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site URB.30 specifically be classified within Flood Zone 2 and Flood Zone 3. | The Council welcomes the EA's comments regarding Site URB.30 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with | Yes | 01926 | Environment Agency |

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| | | national guidance, and ensure compliance with national policy. Thank you for your valuable input. | | | |
| **URB.30: Montagu Industrial Estate** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site URB.30: Montagu Industrial Estate as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site URB.30 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including URB.30 adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **URB.30: Montagu Industrial Estate** | The Environment Agency notes that development on historic landfills, such as Site URB.30: Montagu Industrial Estate, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **URB.30: Montagu Industrial Estate** | For site URB.30, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.30: Montagu Industrial Estate** | For site URB.30, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.30: Montagu Industrial Estate** | For site URB.30, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.30: Montagu Industrial Estate** | Henry Boot Development welcomes the recognition in the draft Plan that 'banqueting suites' are not permitted in Strategic Industrial Locations (SIL) or Locally Significant Industrial Locations (LSIL). | The Council's approach to employment allocations, including the Montagu Industrial Estate, is well-supported by thorough research and strategic planning, as detailed in the Employment Topic Paper (2024), Employment Land Review (2024), and Site Allocation Topic Paper. The Employment Land Review emphasizes the need for intensified use of existing sites to meet future demand, including Montagu Industrial Estate. The draft Local Plan's employment floorspace targets are based on extensive analysis of market demands. Utilizing the GLA's Industrial Intensification and Co-Location Study (2018), the plan promotes not only spatial intensification but also economic, process, and urban intensification for holistic site development. The Council ensures alignment of future site allocations with existing planning permissions and infrastructure requirements, promoting sustainable development. Design principles for Montagu Industrial Estate are guided by the | No | 01943 | Henry Boot Developments (HBD) |

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| | | approved Design Code, balancing high-quality industrial space creation with market adaptability. The policies are evidence-based, integrating ongoing development activities into the strategic vision, ensuring the Local Plan is practical and forward-looking. The Council will continue engaging with Henry Boot Developments and prepare a statement of common ground to address these issues and ensure the policy's soundness. | | | |
| **URB.31: Snowbird Foods Extension** | TfL notes the requirement for the development to provide limited parking but suggests it should be amended to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.31: Snowbird Foods Extension** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site URB.31: Snowbird Foods Extension as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site URB.31 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including URB.31 adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **URB.31: Snowbird Foods Extension** | Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.31: Snowbird Foods Extension** | For site URB.31, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.31: Snowbird Foods Extension** | For site URB.31, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.32: Claverings Industrial Area** | TfL welcomes the requirement to contribute towards increasing direct and frequent bus services along the A1055 to improve connectivity to and from industrial areas. They emphasise that any enhanced bus services must be economically viable based on expected trip generation, noting the difficulty of providing a viable service due to the limited frontages in the area. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.32: Claverings** | For site URB.32, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **Industrial Area** | Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | | | | |
| **URB.32: Claverings Industrial Area** | For site URB.32, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.35: Riverwalk Business Park** | The Environment Agency notes that development on historic landfills, such as Site URB.35: Riverwalk Business Park, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **URB.35: Riverwalk Business Park** | Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.35: Riverwalk Business Park** | For site URB.35, Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.35: Riverwalk Business Park** | For site URB.31, Thames Water comments that the development boundary falls within a Source Protection Zone for groundwater abstraction, posing a risk of pollution from surface activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater resources. Applicants are encouraged to review the Environment Agency's approach to groundwater protection and consult with a qualified environmental consultant to understand the implications for their development. For more details, refer to the Environment Agency's groundwater protection position statements. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.34: 5 Picketts Lock Lane** | TfL welcomes the requirement to contribute towards bus service prioritisation and traffic management measures along the A1010. They emphasise that any enhanced bus services must be economically viable based on expected trip generation, noting the difficulty of providing a viable service due to limited frontages in the area. TfL also notes the requirement for limited parking but suggests amending it to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **URB.34: 5 Picketts Lock Lane** | The Environment Agency notes that development on historic landfills, such as Site URB.34: 5 Picketts Lock Lane, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |

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| **URB.34: 5 Picketts Lock Lane** | For site URB.34, Thames Water does not foresee infrastructure concerns regarding the water supply network for the proposed developments. However, it is recommended that developers and the Local Planning Authority coordinate with Thames Water early to discuss the development's phasing. For further details, contact Thames Water Development Planning via email at Devcon.team@thameswater.co.uk, phone at 02035779998, or in writing at Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.34: 5 Picketts Lock Lane** | For site URB.34,Thames Water does not currently anticipate infrastructure concerns regarding wastewater networks for the proposed developments. However, they recommend that developers and the Local Planning Authority liaise with Thames Water early to discuss development phasing. Contact can be made via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or in writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **URB.34: 5 Picketts Lock Lane** | Stantec, on behalf of CCLA Investment Management for site 5 Pickett's Lock Lane, submits representations in response to the New Enfield Local Plan. Due to file sizes, the submission is split into three emails: Email 1/3: Includes completed Digital Representation forms and Part 1 of the written representations. Email 2/3: Contains Part 2 of the written representations. Email 3/3: Contains Part 3 of the written representations. Stantec requests confirmation of receipt for all three emails and offers further assistance if needed. | Received with thanks. | No | 01895 | CCLA Investment Management (CCLA) who are the appointed Investment Manager for the Local Authorities (LAMIT) on behalf of site 5 Pickett's Lock Lane |
| **RUR.03: Land west of Rammey Marsh** | HCC's response notes that the eastern boundary of the site (RUR.03) is adjacent to the main river Small Lee, which drains a large catchment in the urban Broxbourne area of Hertfordshire. Discharge rates and volumes to the Small Lee must be restricted to greenfield rates to ensure upstream areas in Hertfordshire can drain effectively. The site also includes areas within Flood Zone 2 and 3, and HCC recommends consulting the Environment Agency on any proposals for this site. | Comments noted. The Council acknowledge the importance of restricting discharge rates and volumes to greenfield rates to facilitate effective drainage of upstream areas in Hertfordshire. Additionally, the Council will consult with the Environment Agency on any proposals for the site, especially concerning areas within Flood Zones 2 and 3. The Council will seek to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and the Environment Agency. | Yes | 01755 | Hertfordshire County Council as Lead Local Flood Authority (LLFA) |
| **RUR.03: Land west of Rammey Marsh** | HCC questions whether a mitigation measure at J24 of the M25 is needed to handle growth and increased HGV traffic from the industrial allocation RUR.04 Land East of Junction 24 and welcomes discussion on this. They express concerns about increased traffic volumes and delays on the A10 and A1010 due to industrial allocations off Mollison Avenue (RUR.03 and RUR.05), noting these routes are designated Air Quality Management Areas (AQMAs) and face severe congestion, especially when the M25 is delayed or closed. HCC expects these issues to be investigated through applicable planning applications and supports integrating wording into the plan to ensure this investigation is a policy requirement. | Comments noted. The need for strategic mitigation measures at J24 of the M25 are recognised and are committed to exploring solutions with HCC. The Council is keen to engage further on this matter and will prepare a Statement of Common Ground (SoCG) with HCC to collaboratively address these transportation concerns and ensure the proposed developments align with both Enfield's and Hertfordshire's strategic transport and infrastructure goals. | No | 01755 | Hertfordshire County Council - Highways |
| **RUR.03: Land west of Rammey Marsh** | TfL welcomes the requirement to contribute towards increasing direct and frequent bus services along the A1055 to improve connectivity to and from industrial areas. They emphasize that any enhanced bus services must be economically viable based on expected trip generation, noting the difficulty of providing a viable service due to limited frontages in the area. TfL also notes the requirement to provide limited parking but suggests amending it to state that parking must be minimized to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| **RUR.03: Land west of Rammey Marsh** | The Lee Valley Regional Park Authority (LVRPA) supports the site allocations RUR.03 Rammey Marsh West and RUR.05 Land North West of Innova Park for industrial and logistics development, which have been removed from the Green Belt. They appreciate the revisions in the site proformas that address their previous comments, including the emphasis on ecological and greening enhancements, public open space creation, and improved pedestrian and cycle connectivity. LVRPA seeks to collaborate with the Council on master planning to ensure sensitive redevelopment that enhances environmental quality and integrates with the blue and green network. | Comments noted. The detailed feedback is welcomed. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | No | 01918 | Lee Valley Regional Park Authority |
| **RUR.03: Land west of Rammey Marsh** | Based on available data, the Environment Agency identifies that several sites, including Site RUR.03, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site RUR.03 specifically be classified within Flood Zones 2 and 3. Appendix C states this is FZ1 (page 540). This is incorrect. | The Council welcomes the EA's comments regarding Site RUR.03 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **RUR.03: Land west of Rammey Marsh** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site RUR.03: Land west of Rammey Marsh as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site RUR.03 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including RUR.03 adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **RUR.03: Land west of Rammey Marsh** | The Environment Agency notes that development on historic landfills, such as Site RUR.03: Land west of Rammey Marsh, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **RUR.03: Land west of Rammey Marsh** | For site RUR.03, Thames Water comments that the scale of developments in the catchment will likely require upgrades to the water supply network. They recommend that the developer and Local Planning Authority engage with Thames Water early to agree on a housing phasing plan. This plan is necessary to ensure infrastructure upgrades are completed before the development's occupation. Without this coordination, planning conditions may be imposed to control development phasing. Developers can request network infrastructure information on the Thames Water website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **RUR.03: Land west of Rammey Marsh** | For site RUR.03, Thames Water notes that the scale of the proposed developments will likely necessitate upgrades to the wastewater network. They recommend early liaison between the developer, the Local Planning Authority, and Thames Water to agree on a housing and infrastructure phasing plan. This plan should assess current network capacity and determine the required phasing to ensure development does not outpace necessary infrastructure upgrades. Failure to coordinate may result in planning conditions to control development phasing. Developers can obtain infrastructure information from Thames Water's website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **RUR.03: Land west of** | For site RUR.03, Thames Water highlights that the development boundary is within a Source Protection Zone for groundwater abstraction, posing a risk of pollution. They emphasize the need for a tiered, risk-based approach to regulate activities | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |

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| **Rammey Marsh** | impacting groundwater resources. Developers are encouraged to review the Environment Agency's approach to groundwater protection and consult with an environmental expert. This guidance aims to prevent groundwater contamination from development activities. Further details can be found on the Environment Agency's website. | | | | |
| **RUR.03: Land west of Rammey Marsh** | The London Borough of Enfield Strategic Property Services (LBESPS) expresses support for the proposed Site Allocation SA.RUR.03 – Land West of Rammey Marsh, for industrial and logistics employment uses, consistent with the need for additional employment floorspace identified in the Council's evidence base. LBESPS, collaborating with the Lee Valley Regional Park Authority (LVRPA), endorses the site's allocation due to its strategic location and potential for development, emphasizing its suitability for industrial use given its excellent transport links and proximity to established industrial locations. | The council acknowledges the importance of collaboration and agrees to work together with Enfield Strategic Property Services (LBESPS) as the promoter. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01960 | LBE Strategic Property |
| **RUR.03: Land west of Rammey Marsh** | CPRE London opposes the development of Green Belt land west of Rammey Marsh (SA RUR.03), highlighting its significance to the Metropolitan Green Belt and asserting that Enfield has sufficient brownfield land and existing major sites like Meridian Water for housing development. They emphasize that this protected Green Belt land is designated as part of the Lee Valley Area of Special Character and should not be included as a site allocation. | Comments noted. The Council acknowledges CPRE London's concerns regarding the development of Green Belt land west of Rammey Marsh (SA RUR.03). The Enfield Local Plan (ELP) considers the significance of the Metropolitan Green Belt and prioritizes brownfield sites. However, the ELP Spatial Strategy and Exceptional Circumstances Topic Paper justify the inclusion of certain Green Belt sites to meet housing needs. The Site Allocation Topic Paper and Employment Topic Paper detail the strategic approach, ensuring sustainable development while protecting important green spaces. Rammey Marsh's allocation is based on thorough assessments and the necessity to address employment needs effectively. | No | 01726 | CPRE London |
| **RUR.03: Land west of Rammey Marsh** | Enfield Road Watch objects to SA RUR.03: Land West of Rammey Marsh because the land is currently designated as Green Belt and is part of the Lee Valley Area of Special Character. They emphasize that the area is rich in wildlife and argue that further ecological surveys are needed to understand its significance better. | Comments noted. Enfield's strategic planning documents highlight a balanced approach to development, ensuring sustainable use of Green Belt land while protecting ecological assets. Detailed assessments set out in the evidence base and strategic site allocations support this approach, aligning with Enfield's broader goals for sustainable growth and employment opportunities. | No | 01687 | Enfield Road Watch |
| **RUR.03: Land west of Rammey Marsh** | The Enfield Society argues that SS1 Paragraph 5 erroneously omits the reference to RUR.03 (West of Rammey Marsh), which should provide 70,200 sqm of new employment floorspace. They assert that neither RUR.03 nor RUR.04 (Junction 24 of the M25) conform with the London Plan's spatial strategy or have the exceptional circumstances needed to justify their removal from the Green Belt. Consequently, both sites should be deleted from paragraph 5 to maintain conformity and policy coherence. | Comments noted. The inclusion of RUR.03 (West of Rammey Marsh) and RUR.04 (Junction 24 of the M25) in the Enfield Local Plan (ELP) is strategically justified to meet the borough's employment land needs, aligning with the London Plan's goals and supported by exceptional circumstances necessary for Green Belt release. These sites are crucial for providing new employment floorspace, particularly given their strategic locations near major transport infrastructure. The "Spatial Strategy and Overall Approach" and "Site Allocation Topic Paper" recognise that these allocations are based on detailed assessments demonstrating their suitability for development, contributing significantly to Enfield's economic growth without undermining the integrity of the Green Belt. Therefore, the inclusion of these sites is necessary and compliant with both regional and national planning policies, and their removal from Paragraph 5, as suggested, would not enhance policy coherence. | No | 01794 | Enfield Society |
| **RUR.03: Land west of Rammey Marsh** | The Enfield Society expresses concerns over the proposal to release a large area of Green Belt land for employment, particularly the 70,200sqm site at Rammey Marsh. They argue that the need for this release has not been demonstrated and that exceptional circumstances do not exist. They also question the proposed ecological enhancements, suggesting off-site improvements should focus on the Lee Valley rather than Enfield Chase. Additionally, they find the proposed building heights of up to 39m for industrial use unjustified, as such developments are typically low-rise. The Society supports creating an active travel and biodiversity corridor along the River Lea. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **RUR.04: Land east of** | HCC's response highlights that an ordinary watercourse flows along the eastern boundary of the site (RUR.04), culverted under the M25 before entering | Comments noted. The Council acknowledge the importance of restricting discharge rates and volumes to greenfield rates to facilitate effective drainage of | yes | 01755 | Hertfordshire County |

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| **Junction 24, M25** | Hertfordshire and the main river Turkey Brook. The site must use Sustainable Drainage Systems (SuDS) to ensure outfalls to this watercourse are restricted to greenfield runoff rates and volumes, preventing increased flood risk downstream in Hertfordshire. Additionally, SuDS should ensure robust water quality treatment for all runoff before discharging into the watercourse. | upstream areas in Hertfordshire. Additionally, the Council will consult with the Environment Agency on any proposals for the site, especially concerning areas within Flood Zones 2 and 3. The Council will seek to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and the Environment Agency. | | | Council as Lead Local Flood Authority (LLFA) |
| **RUR.04: Land east of Junction 24, M25** | HCC's response notes that the proposal for industrial use at SA RUR.04, an arable field within a farmed landscape, is incongruous with its agricultural and landscape context and damaging to the local environment's character. Despite this, there appear to be no ecological constraints locally or within Hertfordshire. | Comments noted. | No | 01755 | Hertfordshire County Council - Ecology |
| **RUR.04: Land east of Junction 24, M25** | HCC questions whether a mitigation measure at J24 of the M25 is needed to handle growth and increased HGV traffic from the industrial allocation RUR.04 Land East of Junction 24 and welcomes discussion on this. They express concerns about increased traffic volumes and delays on the A10 and A1010 due to industrial allocations off Mollison Avenue (RUR.03 and RUR.05), noting these routes are designated Air Quality Management Areas (AQMAs) and face severe congestion, especially when the M25 is delayed or closed. HCC expects these issues to be investigated through applicable planning applications and supports integrating wording into the plan to ensure this investigation is a policy requirement. | Comments noted. The need for strategic mitigation measures at J24 of the M25 are recognised and are committed to exploring solutions with HCC. The Council is keen to engage further on this matter and will prepare a Statement of Common Ground (SoCG) with HCC to collaboratively address these transportation concerns and ensure the proposed developments align with both Enfield's and Hertfordshire's strategic transport and infrastructure goals. | No | 01755 | Hertfordshire County Council - Highways |
| **RUR.04: Land east of Junction 24, M25** | TfL notes the requirements to contribute towards increasing direct and frequent bus services to improve connectivity and towards enhancing walking and cycling connectivity from Hadley Wood station. However, TfL's recent work has confirmed that providing more direct and frequent bus services would be costly and unlikely to be sustainable in the long term. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **RUR.04: Land east of Junction 24, M25** | Hertsmere strongly oppose to the site being in strongly performing Green Belt. They express concerns about the lack of consideration of Green Belt harm and the site's deliverability, given Hertsmere's decision not to allocate the adjacent site. Potential negative impacts on the environment and infrastructure, particularly on Potters Bar. | Comments noted. Exceptional Circumstances for the release of Green Belt are set out in the relevant Topic Paper. Further engagement and statement of common ground to consider how to resolve issue. | No | 01924 | Hertsmere Borough Council |
| **RUR.04: Land east of Junction 24, M25** | For site RUR.04, Thames Water does not anticipate any infrastructure concerns regarding the water supply network for the proposed development based on the current information. They recommend early engagement between the developer and Thames Water to discuss the phasing of the development. Contact Thames Water Development Planning for further assistance via email at Devcon.team@thameswater.co.uk, by phone at 02035779998, or by writing to Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **RUR.04: Land east of Junction 24, M25** | For site RUR.04, Thames Water does not foresee infrastructure concerns regarding the wastewater network or treatment capabilities for the proposed development. Early liaison between the developer and Thames Water is recommended to discuss development phasing. Thames Water acknowledges high infiltration flows in the catchment during certain groundwater conditions and advises careful design of new networks to prevent flooding. They are working on a long-term strategy to reduce groundwater entering the sewer network. Developers should collaborate with the Lead Local Flood Authority (LLFA) to establish a sustainable surface water strategy before connecting to the public sewer network. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **RUR.04: Land east of Junction 24, M25** | LBE SPS supports the new Enfield Local Plan, particularly the site allocation at Land East of Junction 24 for a logistics hub. They recommend revising the plot ratio from the London Plan and suggest a single-storey design for feasibility. They propose a flexible approach to the employment floorspace, suggesting an approximate figure of 48,000 sqm instead of a minimum. LBE emphasizes the need for discussions between Enfield and Hertsmere councils to bring forward the wider site and notes that the Enfield portion could proceed independently if necessary. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |

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| **RUR.04: Land east of Junction 24, M25** | Land East of Junction 24 is deemed deliverable according to the NPPF criteria. The site is: 1) Available: It is in single ownership by LBE, supporting employment scheme delivery. 2) Suitable: Though currently Green Belt, it is allocated for employment development in the LBE draft Local Plan. It represents a sustainable location for industrial and logistics growth. 3) Achievable: The site is attractive to the market with no insurmountable constraints, Initial feasibility studies support its deliverability. The site can be developed solely on LBE land or as part of a broader scheme including land in Hertsmere. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **RUR.04: Land east of Junction 24, M25** | LBESPS' comments focus on the site at Land East of Junction 24 (site allocation RUR.04) and highlight the importance of cooperation with other Local Planning Authorities (LPAs) as required by the Localism Act 2011 and NPPF paragraphs 24 to 27. They emphasize the need for ongoing joint working to ensure a positively prepared and justified strategy for a sound Local Plan. LBESPS supports the Council's Duty to Cooperate Compliance Statement (2024) and stresses the importance of discussions with Broxbourne and Hertsmere, particularly for the deliverability of CHPA and Junction 24 sites. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **RUR.04: Land east of Junction 24, M25** | LBESPS' provides supporting material: The "Ridgeway Employment Site" master plan outlines the development of an 11.2-hectare site near Junction 24 of the M25 into a flexible, high-quality employment hub, accommodating various commercial uses such as logistics, industrial spaces, life sciences, and data centres. The plan prioritises flexibility in plot configurations to adapt to future market needs, while integrating sustainable practices like EV charging hubs and biodiversity enhancements. Key recommendations include creating safe access through a new roundabout, maintaining green buffers, and ensuring the site blends well with the surrounding landscape and ecology, supporting both commercial growth and environmental sensitivity. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **RUR.04: Land east of Junction 24, M25** | LBESPS' comments focus on the site at Land East of Junction 24 (site allocation RUR.04) and highlight the importance of cooperation with other Local Planning Authorities (LPAs) as required by the Localism Act 2011 and NPPF paragraphs 24 to 27. They emphasize the need for ongoing joint working to ensure a positively prepared and justified strategy for a sound Local Plan. LBESPS supports the Council's Duty to Cooperate Compliance Statement (2024) and stresses the importance of discussions with Broxbourne and Hertsmere, particularly for the deliverability of CHPA and Junction 24 sites. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **RUR.04: Land east of Junction 24, M25** | CPRE London opposes the development of Green Belt land at M25, Junction 24 (SA RUR.04), emphasizing its importance to the Metropolitan Green Belt and arguing that Enfield has sufficient brownfield land and existing major sites like Meridian Water for housing development. They assert that development would harm the green gateway to the Borough and that this land, designated as Green Belt, should not be included as a site allocation. | Comments noted. The Council acknowledges CPRE London's concerns regarding the development of Green Belt RUR.04: Land east of Junction 24, M25. The Enfield Local Plan (ELP) considers the significance of the Metropolitan Green Belt and prioritizes brownfield sites. However, the ELP Spatial Strategy and Exceptional Circumstances Topic Paper justify the inclusion of certain Green Belt sites to meet housing needs. The Site Allocation Topic Paper and Employment Topic Paper detail the strategic approach, ensuring sustainable development while protecting important green spaces. Rammey Marsh's allocation is based on thorough assessments and the necessity to address employment needs effectively. | No | 01726 | CPRE London |
| **RUR.04: Land east of Junction 24, M25** | Enfield Road Watch objects to SA RUR.04: M25 Junction 24 (The Ridgeway, near St John's School) due to its current designation as Green Belt countryside and an Enfield Chase Area of Special Character within the statutory Development Plan. They argue that the proposed industrial, storage, and distribution center would destroy the farm fields and countryside views that create a green gateway to the borough. | Comments noted. Enfield's planning documents provide a robust justification for this allocation. The Enfield Employment Topic Paper recognises the critical need for industrial and storage facilities to boost local employment opportunities and economic growth. The ELP Spatial Strategy emphasizes balanced development, ensuring that while green spaces are protected, strategic sites like Junction 24 are used to meet economic goals. The Site Allocation Topic Paper details the rationale for selecting this site, balancing development with environmental considerations and aligning with broader regional planning policies. These, alongside Enfield's extensive evidence base justifies the approach and highlight the Council's commitment to sustainable development, ensuring that essential employment needs are met while preserving the character of the area. | No | 01687 | Enfield Road Watch |

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| **RUR.04: Land east of Junction 24, M25** | The Enfield Society argues that SS1 Paragraph 5 erroneously omits the reference to RUR.03 (West of Rammey Marsh), which should provide 70,200 sqm of new employment floorspace. They assert that neither RUR.03 nor RUR.04 (Junction 24 of the M25) conform with the London Plan's spatial strategy or have the exceptional circumstances needed to justify their removal from the Green Belt. Consequently, both sites should be deleted from paragraph 5 to maintain conformity and policy coherence. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **RUR.04: Land east of Junction 24, M25** | The Enfield Society raises several concerns about the proposed development site, including questioning the necessity of the development in this Green Belt area, which the Green Belt Study deems would cause 'very high harm'. The site is a valued landscape, part of Enfield Chase, and strategically important open space. The need for coordination with Hertsmere District Council for road safety and other infrastructure requirements complicates the feasibility of the development. The proposed heights for buildings and the impact on pedestrian and cycle connectivity are also problematic, making the policy appear unsound and inconsistent with both the London Plan and national policies. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **RUR.04: Land east of Junction 24, M25** | The Barnet Society points out the need for clarity regarding the phrase "must be brought forward in conjunction with the wider land ownership in Hertsmere District Council." They also express concern over the lack of consultation with Hertsmere.<br>Environmental Concerns: The Society is worried about the environmental impact, particularly on adjoining land in Hertsmere that is designated for wildlife. They argue that the proposed development's scale, especially at a key "green gateway" near M25 Junction 24, is excessive. The Society requests specific details about the land, its purpose, and the extent of collaboration with Hertsmere. They suggest adding safeguards to protect the wildlife areas in Hertsmere.<br>Reevaluation of Development Scale: The Society recommends reconsidering the scale of development to ensure it aligns with environmental and community needs, emphasizing that the current proposal is too large for the sensitive area. Their recommendations aim to ensure that the development is well-coordinated, environmentally responsible, and appropriately scaled for the area. | Comments noted. The plan emphasizes the importance of strategic sites like RUR.04 for supporting economic growth and meeting employment needs, especially near transport hubs like M25 Junction 24. The plan seeks to balance development with environmental considerations and inter-borough coordination. The Employment Topic Paper highlights the necessity of developing logistics hubs near major transportation routes to meet employment targets and support the regional economy. The site allocation includes provisions for environmental safeguards, ensuring that development near sensitive areas like those in Hertsmere is done with caution and in alignment with regional planning efforts. The Integrated Impact Assessment (IIA) assesses the environmental impact and supports the integration of safeguards for wildlife and natural landscapes, particularly where developments intersect with other boroughs. The Enfield Local Plan’s allocation of SA RUR.04 is justified by the need to meet employment and economic growth targets while ensuring that development is environmentally sustainable and coordinated with neighboring boroughs like Hertsmere. The plan already incorporates environmental safeguards and clarifies the role of inter-borough cooperation, addressing the concerns raised by The Barnet Society. Further engagement with Hertsmere is consistent with the plan’s commitment to regional planning collaboration and environmental protection. | No | 01817 | The Barnet Society |
| **RUR.05: Land to the north west of Innova Park** | HCC's response highlights that an ordinary watercourse flows along the eastern boundary of the site (RUR.05), culverted under the M25 before entering Hertfordshire and the main river Turkey Brook. The site must use Sustainable Drainage Systems (SuDS) to ensure outfalls to this watercourse are restricted to greenfield runoff rates and volumes, preventing increased flood risk downstream in Hertfordshire. Additionally, SuDS should ensure robust water quality treatment for all runoff before discharging into the watercourse. | Comments noted. The Council acknowledge the importance of restricting discharge rates and volumes to greenfield rates to facilitate effective drainage of upstream areas in Hertfordshire. Additionally, the Council will consult with the Environment Agency on any proposals for the site, especially concerning areas within Flood Zones 2 and 3. The Council will seek to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and the Environment Agency. | yes | 01755 | Hertfordshire County Council as Lead Local Flood Authority (LLFA) |
| **RUR.05: Land to the north west of Innova Park** | HCC questions whether a mitigation measure at J24 of the M25 is needed to handle growth and increased HGV traffic from the industrial allocation RUR.04 Land East of Junction 24 and welcomes discussion on this. They express concerns about increased traffic volumes and delays on the A10 and A1010 due to industrial allocations off Mollison Avenue (RUR.03 and RUR.05), noting these routes are designated Air Quality Management Areas (AQMAs) and face severe | Comments noted. The need for strategic mitigation measures at J24 of the M25 are recognised and are committed to exploring solutions with HCC. The Council is keen to engage further on this matter and will prepare a Statement of Common Ground (SoCG) with HCC to collaboratively address these transportation concerns and ensure the proposed developments align with both Enfield’s and Hertfordshire’s strategic transport and infrastructure goals. | No | 01755 | Hertfordshire County Council - Highways |

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| | congestion, especially when the M25 is delayed or closed. HCC expects these issues to be investigated through applicable planning applications and supports integrating wording into the plan to ensure this investigation is a policy requirement. | | | | |
| **RUR.05: Land to the north west of Innova Park** | TfL welcomes the requirement to contribute towards increasing direct and frequent bus services along the A1055 to improve connectivity to and from industrial areas. They emphasise that any enhanced bus services must be economically viable based on expected trip generation and note the difficulty of providing a viable service due to limited frontages in the area. TfL also notes the requirement to provide limited parking but suggests amending it to state that parking must be minimised to ensure consistency with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **RUR.05: Land to the north west of Innova Park** | The Lee Valley Regional Park Authority (LVRPA) supports the site allocations RUR.03 Rammey Marsh West and RUR.05 Land North West of Innova Park for industrial and logistics development, which have been removed from the Green Belt. They appreciate the revisions in the site proformas that address their previous comments, including the emphasis on ecological and greening enhancements, public open space creation, and improved pedestrian and cycle connectivity. LVRPA seeks to collaborate with the Council on master planning to ensure sensitive redevelopment that enhances environmental quality and integrates with the blue and green network. | Comments noted. The detailed feedback is welcomed. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | No | 01918 | Lee Valley Regional Park Authority |
| **RUR.05: Land to the north west of Innova Park** | Based on available data, the Environment Agency identifies that several sites, including Site RUR.05, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site RUR.05 specifically be classified within Flood Zone 2. Appendix C states this is FZ1 (page 544). This is incorrect. | The Council welcomes the EA's comments regarding Site RUR.05 and its classification within Flood Zone 2. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **RUR.05: Land to the north west of Innova Park** | The Environment Agency emphasizes the sensitivity of sites within Source Protection Zone (SPZ) 1, which are critical for supplying potable water. Developments within these areas must adhere to additional constraints to protect groundwater quality, following the Environment Agency's Approach to Groundwater Protection guidelines. These guidelines include specific position statements regarding storage facilities, sewage effluent discharges, sustainable drainage systems, and more. Notably, the EA highlights Site RRUR.05: Land to the north west of Innova Park as being either partly or wholly within SPZ1. The EA recommends that any development proposals involving piled foundations on such sites require a robust Foundation Works Risk Assessment (FWRA) to demonstrate that groundwater quality will not deteriorate. Without this assessment, the EA would object to the use of piled foundations on these sites. | The council welcomes the detailed feedback regarding Site RUR.05 and the importance of Source Protection Zone (SPZ) 1. The Council acknowledges the sensitivity of sites within SPZ1 and recognizes the critical need to protect potable water supplies. We will ensure that development proposals for these sites, including RUR.05 adhere to the Environment Agency's Approach to Groundwater Protection guidelines. Additionally, we will require that any development involving piled foundations within SPZ1 be accompanied by a robust Foundation Works Risk Assessment (FWRA) to ensure there is no risk to groundwater quality. The Council is committed to working closely with the Environment Agency to ensure all necessary safeguards are in place, and we appreciate your continued support in this process. | Yes | 01926 | Environment Agency |
| **RUR.05: Land to the north west of Innova Park** | The Environment Agency notes that development on historic landfills, such as Site RUR.05: Land to the north west of Innova Park, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **RUR.05: Land to the north west of Innova Park** | Thames Water supports the allocation of the former Thames Water Rammey Marsh Sewage Sludge beds (SA RUR.05) for employment development and agrees with its removal from the Green Belt. They suggest amending Design Principle G to allow greater flexibility in design and responsiveness to market demands. Additionally, they propose enhancing Design Principle D to improve public security and surveillance. Thames Water agrees that the impact of releasing the site from the Green Belt is low and supports the Council's assessment of low Green Belt harm. They highlight the site's strategic importance and suitability for logistics and distribution uses. | The council acknowledges Thames Water's recommendation for early engagement between developers and the Local Planning Authority to coordinate a housing phasing plan, ensuring that water supply network infrastructure upgrades are completed ahead of new developments. We will encourage developers to liaise with Thames Water at the earliest stages to avoid any delays and prevent the need for planning conditions to control development phasing. We appreciate the guidance provided and will direct developers to the Thames Water website for infrastructure information. The council remains committed to collaborating with | Yes | 01681 | Thames Water |

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| | | Thames Water to support responsible development and maintain essential services. | | | |
| **RUR.05: Land to the north west of Innova Park** | For site RUR.05, Thames Water indicates that the proposed scale of development in this catchment will likely necessitate upgrades to the water supply network infrastructure. They recommend early liaison between the developer and the Local Planning Authority to create a housing phasing plan. This collaboration will help avoid planning conditions at the application stage, ensuring that necessary infrastructure upgrades are completed before the occupation of developments. Developers can find more information and request network infrastructure details via the Thames Water website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **RUR.05: Land to the north west of Innova Park** | For site RUR.05, Thames Water suggests that the scale of proposed developments will likely necessitate upgrades to the wastewater network. They recommend that developers and the Local Planning Authority engage with Thames Water early to agree on a housing and infrastructure phasing plan. This plan should determine current spare capacity and required phasing to ensure development does not outpace necessary network upgrades. Early liaison will help avoid planning conditions at the application stage. Developers can request more information on network infrastructure through the Thames Water website. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **RUR.05: Land to the north west of Innova Park** | For site RUR.05, Thames Water notes that the development boundary falls within a Source Protection Zone for groundwater abstraction, which is at risk from polluting activities. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities impacting groundwater. The applicant is encouraged to read the Environment Agency's approach to groundwater protection and may need to consult a qualified environmental expert to discuss the implications for their development. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with Thames Water to clarify these points further and ensure mutual understanding and agreement on these matters. | No | 01681 | Thames Water |
| **RUR.05: Land to the north west of Innova Park** | The Enfield Society's concerns about the site in the Green Belt highlight that the need for proposed employment uses has not demonstrated the required 'exceptional circumstances' for Green Belt release. The proposed 39m tall buildings are not justified for the intended employment uses. Additionally, Design Principle C should mandate, rather than suggest, the maintenance of a pedestrian connection parallel to the watercourse towards the Small River Lea. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **SA6.2: Barnet and Southgate college** | TfL welcome the requirement to contribute towards identified TfL upgrades to London Underground network serving Southgate although there is as yet no identified viable way of installing lifts to make Southgate station step-free and so any station improvements would need to focus on general access or capacity improvements. They welcome the requirement that the development should be designed as car free which is consistent with the London Plan. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **SA6.2: Barnet and Southgate college** | The Councillor for Southgate Ward argues that the Local Plan's proposal to consider housing on the Barnet and Southgate College (SA6.2) and Alan Pullinger Youth Centre (SA6.3) sites is inappropriate, emphasizing that these sites should remain dedicated to their current uses without being compromised by shared residential development. | Comments noted. Site selection process informed by a robust site selection methodology. | No | 01836 | Cllr Morreale |
| **URB.36: Church Street Recreation Ground** | TfL support streetscape improvements but any proposals affecting the A10 or its frontage including the proposed vehicle access to the crematorium should be discussed and agreed with TfL before inclusion in the site allocation (URB.36). | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| **URB.36: Church Street Recreation Ground** | The Environment Agency advises that a Groundwater Risk Assessment will be required for cemetery developments, in line with the guidance "Cemeteries and Burials: Groundwater Risk Assessments" and Section L of the Environment Agency's Approach to Groundwater Protection. The guidance was updated on 2nd October 2023 to reflect revised regulations for new cemetery developments, as outlined in "Protecting Groundwater from Human Burials." This applies to Site URB.36: Church Street Recreation Ground. | The Council acknowledges the need for a Groundwater Risk Assessment in accordance with the updated "Cemeteries and Burials: Groundwater Risk Assessments" guidance and the Environment Agency's Approach to Groundwater Protection. We will ensure that developers are informed of these updated regulations and comply with the necessary assessments to protect groundwater from human burials. We appreciate your ongoing collaboration on this matter. | Yes | 01926 | Environment Agency |
| **URB.36: Church Street Recreation Ground** | Sport England considers that this site allocation UR.36 proposed would result in the loss of quality playing fields including a cricket pitch and football pitches. The 2018 PPS seeks to protect the site and advocates for improvement to the changing facilities and cricket wickets. Sport England object to this site allocation as it does not meet with NPPF paragraph 103 or Sport England Playing Fields Policy. If the site was to be allocated for a crematorium, then the playing fields would need to be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. As a statutory consultee, Sport England would object to any application that would result in the loss of the playing field without appropriate mitigation measures in place. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **URB.36: Church Street Recreation Ground** | LBESPS supports the allocation of Church Street Recreation Ground (SA URB.36) for a crematorium, emphasizing the importance of detailed design. They endorse the promotion of nature recovery and biodiversity enhancements as part of the site's development. The site is viewed as deliverable, with a recommended development timeframe of up to 10 years. The allocation is prioritized for development due to its suitability. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **URB.36: Church Street Recreation Ground** | Bush Hill Park Residents Association object to the inclusion of URB.36: Church Street Recreation Ground as a site allocation. They arugue that the Church Street Recreation Ground, as it is designated as Metropolitan Open Land, should receive the same level of protection as Green Belt land. Concerns are raised about its suitability as a development site due to its proximity to a school and residential properties. Additionally, the proposal would result in the loss of valuable open amenity space in a well-established residential area, making it an inappropriate choice for development. They suggest the policy should be deleted from the plan. | The Council's proposal for a crematorium on Church Street Recreation Ground, despite concerns raised, is justified by comprehensive assessments of burial and cremation needs and careful consideration of site allocation. The Enfield Burial Space Need and Provision Study (2020) highlights a significant projected shortfall in cremation capacity by the end of the decade, with existing facilities nearing full capacity. This study supports the need for additional crematorium services to meet growing demand, especially given the historical trend of higher burial rates compared to cremations. Furthermore, the Site Allocation Topic Paper for Regulation 19 acknowledges that Church Street Recreation Ground is a valuable community asset but emphasizes that the proposed use aligns with the need for increased cremation capacity and the lack of suitable alternative sites. The paper also outlines that the selected site was chosen after evaluating multiple options and considering potential impacts. Although the site is Metropolitan Open Land, the proposal includes measures to mitigate impacts, such as preserving existing trees where possible and ensuring that the development integrates well with the surrounding area. The Council's approach strives to balance the essential need for expanded cremation facilities with maintaining the viability and functionality of local green spaces. The council is committed to mitigating environmental impacts and ensuring the site is developed in accordance with planning policies, including addressing air quality concerns and providing necessary infrastructure improvements. This thorough assessment and strategic planning ensure that the proposed development aligns with broader community needs while complying with relevant policies. | No | 04218 | Bush Hill Park Residents Association |
| **URB.36: Church Street Recreation Ground** | The Councillor, on behalf of the Edmonton and Winchmore Hill Conservative Association objects to the proposal for a crematorium on Church Street Recreation Ground, arguing it fails to meet soundness criteria due to its adverse impact on the community, policy conflicts, and insufficient infrastructure planning. They highlight that the site, a valued Metropolitan Open Land used extensively for recreation, would be significantly compromised in terms of openness and accessibility, contradicting NPPF and local policies. Concerns include noise, pollution, inadequate parking, and potential traffic issues, as well as a lack of justification for the need for a new crematorium when expansion of existing facilities or alternative sites could be considered. | The Council's proposal for a crematorium on Church Street Recreation Ground, despite concerns raised, is justified by comprehensive assessments of burial and cremation needs and careful consideration of site allocation. The Enfield Burial Space Need and Provision Study (2020) highlights a significant projected shortfall in cremation capacity by the end of the decade, with existing facilities nearing full capacity. This study supports the need for additional crematorium services to meet growing demand, especially given the historical trend of higher burial rates compared to cremations. Furthermore, the Site Allocation Topic Paper for Regulation 19 acknowledges that Church Street Recreation Ground is a valuable community asset but emphasizes that the proposed use aligns with the need for | No | 01784 | Edmonton and Winchmore Hill Conservative Association |

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| | | increased cremation capacity and the lack of suitable alternative sites. The paper also outlines that the selected site was chosen after evaluating multiple options and considering potential impacts. Although the site is Metropolitan Open Land, the proposal includes measures to mitigate impacts, such as preserving existing trees where possible and ensuring that the development integrates well with the surrounding area. The Council's approach strives to balance the essential need for expanded cremation facilities with maintaining the viability and functionality of local green spaces. The council is committed to mitigating environmental impacts and ensuring the site is developed in accordance with planning policies, including addressing air quality concerns and providing necessary infrastructure improvements. This thorough assessment and strategic planning ensure that the proposed development aligns with broader community needs while complying with relevant policies. | | | |
| **URB.36: Church Street Recreation Ground** | The Councillor objects to the proposed site allocation URB.36 for a crematorium at Church Street Recreation Ground, arguing that it would contravene the NPPF by reducing vital open space in a densely populated area. He highlights concerns about increased traffic congestion and safety issues on the A10, as well as potential environmental impacts on mature trees and local air quality. The Councillor also questions the necessity of a new facility, citing sufficient existing cremation and burial capacities. Emphasizing the recreational ground's significance for community health and well-being, he contends that the proposal fails to meet the NPPF's soundness criteria. The Councillor recommends removing Church Street Recreation Ground from the plan and urges Enfield Council to explore more suitable locations within or beyond the borough. He also suggests considering the expansion of the existing Enfield Crematorium at its current site. | Comments noted. The Enfield Burial Needs Assessment 2020 and the site allocation topic paper for Regulation 19 highlights the need for additional cremation facilities due to increasing demand and insufficient existing capacity, noting a rising population and limited burial space, which necessitates diversifying the provision of final rites facilities, including crematoria. The Council acknowledges the importance of open spaces and intends to balance development needs with preserving community amenities through strategic planning and mitigation measures. | No | 01779 | Cllr Fallart |
| **URB.36: Church Street Recreation Ground** | The Councillor on behalf of the Edmonton and Winchmore Hill Conservative Association object to the proposed crematorium at Church Street Recreation Ground as set out in URB.36. | Comments noted. The Enfield Burial Needs Assessment 2020 and the site allocation topic paper for Regulation 19 highlights the need for additional cremation facilities due to increasing demand and insufficient existing capacity, noting a rising population and limited burial space, which necessitates diversifying the provision of final rites facilities, including crematoria. The Council acknowledges the importance of open spaces and intends to balance development needs with preserving community amenities through strategic planning and mitigation measures. | No | 01784 | Edmonton and Winchmore Hill Conservative Association |
| **URB.36: Church Street Recreation Ground** | The Councillor on behalf of the Edmonton and Winchmore Hill Conservative Association objects to the proposed site allocation URB.36 for a crematorium at Church Street Recreation Ground. They argue that the proposal fails to meet the NPPF soundness test due to the site's importance as a valued community asset in a densely populated residential area. The recreation ground, which was especially vital during the pandemic, is frequently used for sports and recreation. The Association raises concerns about the adverse impacts on local residents, including noise, pollution, and traffic congestion, especially as the site abuts Latymer School and residential gardens. The Association also highlights that Church Street Recreation Ground is designated as Metropolitan Open Land (MOL), which should be protected against inappropriate development according to the NPPF and Enfield's Local Plan policies BG5 and BG6. They argue that constructing a crematorium, along with the necessary ancillary structures, would reduce the openness of the land, contravening MOL protections. The case of Muir v. Wandsworth Borough Council is cited, where the court ruled against development that restricted public access to open spaces, suggesting a similar outcome could occur here. Furthermore, they point out that the proposal lacks adequate provisions for parking and access, potentially exacerbating congestion | Comments noted. The Enfield Burial Needs Assessment 2020 and the site allocation topic paper for Regulation 19 highlights the need for additional cremation facilities due to increasing demand and insufficient existing capacity, noting a rising population and limited burial space, which necessitates diversifying the provision of final rites facilities, including crematoria. The Council acknowledges the importance of open spaces and intends to balance development needs with preserving community amenities through strategic planning and mitigation measures. | No | 01784 | Edmonton and Winchmore Hill Conservative Association |

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| | on the A10 and surrounding streets. The development also conflicts with Enfield Council's priorities, such as enhancing green spaces and promoting healthy lifestyles, as outlined in the Investing in Enfield plan. Concerns are also raised about the potential loss of mature horse chestnut trees and the impact on local biodiversity. The Association questions the need for a new crematorium, given the lack of evidence for increased cremation demand in Enfield, and suggests that alternative sites, including the expansion of the existing Enfield Crematorium, should be considered. They also highlight concerns about air pollution in a residential area, stating that the proposal contradicts the Council's own environmental policies. For these reasons, the Association believes the proposal fails the soundness test and should be removed from the draft local plan. There is strong opposition from the local community, evidenced by a petition against the proposal that has gathered 1,649 signatories at the time of writing. The Association requests the opportunity to address the hearing to elaborate on these objections and to voice the genuine concerns of local residents about the impact this development would have on their lives if it proceeds. For these reasons, they believe the proposal fails the soundness test and should be removed from the draft local plan. | | | | |
| **RUR.06: Land at Picketts Lock** | National Grid has reviewed the Enfield Local Plan and identified that several proposed development sites, including RUR.06 (Land at Picketts Lock), SA5.2 (Meridian Water Phase 2), and SA5.6 (Meridian East - Harbet Road), are crossed or in close proximity to NGET assets. They propose modifications to include site-specific criteria, such as a strategy for responding to NGET overhead transmission lines, ensuring the NGET Design Guide and Principles are applied during masterplanning to reduce the impact through good design. | Comments noted. Clarification will be included in the Statement of Common Ground. The Council is happy to work with National Grid to clarify these points further and ensure mutual understanding and agreement on these matters. | Yes | 01658 | National Grid |
| **RUR.06: Land at Picketts Lock** | National Grid has reviewed the Enfield Local Plan and identified that several proposed development sites, including RUR.06 (Land at Picketts Lock), SA5.2 (Meridian Water Phase 2), and SA5.6 (Meridian East - Harbet Road), are crossed or in close proximity to NGET assets. They propose modifications to include site-specific criteria, such as a strategy for responding to NGET overhead transmission lines, ensuring the NGET Design Guide and Principles are applied during masterplanning to reduce the impact through good design. | Comments noted. The Council acknowledges the importance of considering existing utilities in development planning. Clarification will be included in the Statement of Common Ground. The Council is happy to work with National Grid to clarify these points further and ensure mutual understanding and agreement on these matters. | Yes | 01658 | National Grid |
| **RUR.06: Land at Picketts Lock** | TfL welcomes the requirement to contribute towards bus service prioritisation and associated traffic management measures along the A1010. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |
| **RUR.06: Land at Picketts Lock** | The Lee Valley Regional Park Authority (LVRPA) supports the inclusion of references to Pickett's Lock in the draft Local Plan but seeks a minor amendment to Site Allocation RUR.06. Pickett's Lock, a strategic site within Enfield's Regional Park, hosts the Lee Valley Athletics Centre, Odeon Luxe Cinema, golf course, and campsite. The LVRPA supports the revised site allocation for new sports, recreation, and leisure facilities. They request amending the description of existing uses to include all current facilities and adjacent land. | Comments noted. The detailed feedback is welcomed. The Council propose working closely with the Lee Valley Regional Park Authority (LVRPA) to develop a Statement of Common Ground (SoCG). This collaborative approach will ensure that the Local Plan accurately reflects the strategic importance of the Park, aligns with the Park Development Framework, and supports enhancements to green and blue infrastructure and leisure provisions within the borough. | No | 01918 | Lee Valley Regional Park Authority |
| **RUR.06: Land at Picketts Lock** | Based on available data, the Environment Agency identifies that several sites, including Site RUR.06, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site RUR.06 specifically be classified within Flood Zone 2. Appendix C states this is FZ1 (page 544). This is incorrect. | The Council welcomes the EA's comments regarding Site RUR.06 and its classification within Flood Zone 2. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |

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| **RUR.06: Land at Picketts Lock** | The Environment Agency notes that development on historic landfills, such as Site RUR.06: Land at Picketts Lock, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. Developers should inquire about potential requirements under the Environmental Permitting Regulations 2016 when planning developments on these sites. | The Council acknowledges the potential need for Environmental Permits in line with the Environmental Permitting Regulations 2016 for the reuse of site materials or waste recovery activities. We will ensure developers are informed of these requirements and will collaborate with the Environment Agency to ensure compliance throughout the development process. | Yes | 01926 | Environment Agency |
| **RUR.06: Land at Picketts Lock** | Sport England support the upgrade to facilities, however this allocated also suggests the loss of the existing golf course, Sport England would like to see this allocation referenced in an up-to-date PPS to better understand the strategic need for an upgrade to this facility as this is not mentioned in the existing PPS. This allocation does not currently meet with NPPF 103 or Sport England Policy. any new sports and leisure facilities should meet a strategically identified need. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **RUR.06: Land at Picketts Lock** | The Wave generally supports the Local Plan as it pertains to their activities but has concerns about the wording of policy SA RUR.06, deeming it unjustified. They suggest specific modifications to address these issues, aiming to make the policy more sound. | The council appreciates The Wave's support and acknowledges the concerns regarding the wording of policy SA RUR.06. The Council will continue to engage with The Wave and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | No | 01880 | The Wave |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | HCC's response notes that the site (RUR.07) includes areas of the main rivers Turkey Brook and Cuffley Brook, which drain large catchments in Hertfordshire. New outfalls to these rivers must restrict discharge rates and volumes to greenfield rates to ensure upstream areas in Hertfordshire can drain effectively. HCC acknowledges the Local Plan's requirement for incorporating Sustainable Drainage Systems (SuDS) into the development and recommends early engagement between Enfield LLFA and developers. | Commenrs noted. The Council acknowledge the importance of restricting discharge rates and volumes to greenfield rates to ensure effective drainage of upstream areas in Hertfordshire. The Council appreciates HCC's recognition of the Local Plan's requirement to incorporate Sustainable Drainage Systems (SuDS) into the development. The Council will ensure early engagement between Enfield LLFA and developers to address these recommendations. The Council will seek to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and the Environment Agency. | No | 01755 | Hertfordshire County Council as Lead Local Flood Authority (LLFA) |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | HCC's comments note that the site (RUR.07) contains areas of the main rivers Turkey Brook and Cuffley Brook, which drain large catchments in Hertfordshire. Any new outfalls to these rivers must restrict discharge rates and volumes to greenfield rates to prevent upstream drainage issues. HCC acknowledges that the Local Plan states SuDS must be incorporated into the development and recommends early engagement between Enfield LLFA and developers to ensure these measures are effectively implemented. | Comments noted. The Council will ensure early engagement between Enfield LLFA and developers to address these recommendations. The Council will seek to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and the Environment Agency. | No | 01755 | Hertfordshire County Council - Ecology |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training** | TfL reiterates their recommendation to exclude major trip-generating uses from the site allocation (RUR.07) due to the relatively poor connectivity. | Comments noted. The Council is committed to working collaboratively with Transport for London and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01891 | Transport for London |

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| **Ground, Hotspurs Way, Whitewebbs Lane** | | | | | |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | Based on available data, the Environment Agency identifies that several sites, including Site RUR.07, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site RUR.07 specifically be classified within Flood Zones 2 and 3. Appendix C states this is FZ1 and FZ2 (page 550). This is incorrect. | The Council welcomes the EA's comments regarding Site RUR.07 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | The loss of the Whitewebbs Golf Course is not supported by an up-to-date needs assessment. This site allocation does not meet with any of the three exceptions of paragraph 103 of the NPPF and London Plan Policy S5C. Sport England would like to see this site allocation supported by an up-to-date PPS and conversations taking place with National Governing Bodies to understand the strategic need for certain playing fields to meet the communities needs. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | Tottenham Hotspur FC (THFC) has several concerns regarding the draft site allocation for the operational training ground and the proposed Women and Girls Training Centre. They request extending the allocation to include additional land and updating references to the former Whitewebbs Golf Course. They support the proposed land uses but suggest clarifying terms and aligning the estimated delivery timeframe with current developments. THFC also suggests modifying design principles to account for practical constraints, such as limiting public access in professional sporting areas and ensuring feasible pedestrian and cycle connections. | The Council will continue to engage with Tottenham Hotspur and prepare a statement of common ground to address these issues and ensure the policy is justified and sound. | Yes | 01861 | on behalf of Tottenham Hotspur Football Co Ltd |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of** | LBESPS supports the allocation of Whitewebbs Golf Course and the Tottenham Hotspurs Football Club Training Ground (SA RUR.07) for nature recovery and professional sports, recreation, and community sports/leisure uses, including ancillary facilities. They emphasize the importance of discussions with Sport England and Tottenham Hotspurs, as well as with Historic England due to nearby heritage assets. They support biodiversity enhancements and sustainability-led | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |

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| **Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | design. They endorse the proposed development timeframe of up to 10 years, considering the site deliverable and prioritizable for development. | | | | |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | THFC support the general approach of the Local Plan in respect of its permissive approach to a range of land uses associated with the development of professional sports facilities which are identified in Allocation SA RUR.07. | Comments noted. | No | 02089 | Tottenham Hotspur Football Co Ltd |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | THFC identifies a number of matters that they believe need to be addressed in order to make this part of the Plan sound. THFC conceed that the changes do not go to the heart of the soundness of the Plan as a whole, and can be relatively simply changed through modifications which are no more than minor. This includes a request to extend the allocaiton; omit references to 'existing' golf course; ammend the requirements of the allocation; update the delivery timing; and, reword design principles. | Comments noted. The Council is committed to working collaboratively to ensure that these minor adjustments are addressed efficiently without undermining the overall soundness of the Plan. | No | 02089 | Tottenham Hotspur Football Co Ltd |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | CPRE London strongly objects to the allocation of Whitewebbs Park for commercial use by Tottenham Hotspur Football Club, as it contradicts policies in both the Draft Plan and the London Plan. The development is deemed inappropriate for Green Belt land due to the high fencing that will alter the landscape, impacting protected views and transforming valuable public green space into an enclosed area, akin to built development. Additionally, this allocation conflicts with Enfield's and the London mayor's targets to enhance wild spaces and habitats for nature, as it will destroy vital natural areas, replacing them with engineered surfaces and causing significant impacts from light and noise. They request confirmation of the receipt of these comments. | The council's strategy to allocate Whitewebbs Golf Course and the land at Tottenham Hotspurs Training Ground for nature recovery uses, professional sport, recreation and community sports/leisure uses by Tottenham Hotspur Football Club is justified based on the need for effective land use and the exceptional circumstances outlined. The "Spatial Strategy and Overall Approach Topic Paper," explains that the council aims to balance development with the preservation of green spaces, ensuring that land use contributes to both the economic and social needs of the borough. The "Exceptional Circumstances Topic Paper" further supports this allocation by detailing the unique conditions that necessitate such developments, emphasizing that the proposed use will contribute significantly to local employment and community facilities, while the overall strategy includes measures to mitigate environmental impacts and maintain public access to green spaces. The comprehensive planning approach ensures that the benefits of the development outweigh the potential negative impacts, aligning with broader regional and national planning policies. | No | 01944 | CPRE London |
| **RUR.07: Whitewebbs** | Enfield Road Watch's objection to SA RUR.07 highlights the Judicial Review challenging Enfield Council's decision to lease land to Tottenham Hotspurs, which | Comments noted. The Site Alloction aligns with Enfield's strategic objectives to enhance recreational facilities, balancing development with green space | No | 01687 | Enfield Road Watch |

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| **Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | they argue compromises the open parkland character and historic value of Whitewebbs. They also emphasize that the Green Belt status makes development inconsistent with national policy, criticize the vague goals regarding public access and heritage assets, and note a shift from nature recovery to sport and leisure uses. | preservation as detailed in the ELP Spatial Strategy and Overall Approach Topic Paper. The Enfield Employment Topic Paper highlights the necessity for multifunctional spaces to support both community use and local employment. The Site Allocation Topic Paper provides a framework ensuring public access, heritage protection, and ecological conservation. | | | |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | The site is under Judicial Review regarding its use by Tottenham Hotspurs, with concerns about fencing affecting the open parkland character and historic landscape of Whitewebbs. The site is in the Green Belt, and development is inconsistent with national policy. Design Principle A lacks clarity on the extent of publicly accessible space. The policy should ensure the pond and woodlands near Whitewebbs House remain accessible. Design Principle F needs to specify which heritage assets will be restored and how, potentially through S106 contributions. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane** | Whitewebbs Park in Enfield consists of ancient woodland and 19th-century parkland, purchased as public open space in 1931. The park, previously a public golf course, reverted to open space in 2021. Located within the green belt, it offers leisure activities like walking, running, and horse riding. The park features heritage elements and panoramic views that are sensitive to development. Concerns include the impact of high fencing, hedging, and tree planting on the landscape's openness. Intensive sports facilities are deemed inappropriate due to topography, accessibility issues, and the area's natural rewilding. The only support for reallocation to sport and leisure comes from a narrow commercial interest. | Comments noted. The Site Allocation Topic Paper justifies maintaining its open character. | No | 01805 | Friends of Whitewebbs Park |
| **RUR.08: Sloemans Farm** | HCC's response highlights that the site (RUR.08) is adjacent to the main river Cuffley Brook. Surface water runoff must be managed on-site to ensure that any discharges to Cuffley Brook are restricted, preventing any hindrance to upstream flows. | Comments noted. | No | 01755 | Hertfordshire County Council as Lead Local Flood Authority (LLFA) |
| **RUR.08: Sloemans Farm** | HCC has a neutral stance on SA RUR.08 for Burial Ground, noting it will not contribute ecologically to the area south of the M25 unless significant ecological management is implemented prior to and/or during its use. The ecological impact will depend on the burial density and intended cemetery character, likely to be formal. The existing arable land and intensive farmland in Hertfordshire are of little | Comments noted. The Council will ensure early engagement between Enfield LLFA and developers to address these recommendations. The Council will seek to address these concerns through a Statement of Common Ground (SoCG) with Hertfordshire County Council and the Environment Agency. | No | 01755 | Hertfordshire County Council - Ecology |

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| | intrinsic ecological interest, though the farmland in Hertfordshire appears better managed and possibly less degraded. | | | | |
| **RUR.08: Sloemans Farm** | Based on available data, the Environment Agency identifies that several sites, including Site RUR.08, are either partly or wholly within Flood Zones 2 or 3. The EA recomends that Site RUR.08 specifically be classified within Flood Zones 2 and 3. Appendix C states this is FZ1 and FZ2 (page 552). This is incorrect. | The Council welcomes the EA's comments regarding Site RUR.08 and its classification within Flood Zones 2 and 3. The Council acknowledges the Environment Agency's recommendation to accurately classify the site based on its flood risk. We will review the data and ensure that the Local Plan reflects this updated classification. The Council is committed to continuing our collaborative work with the Environment Agency through a Statement of Common Ground to review the evidence base, apply the sequential and exceptions tests in line with national guidance, and ensure compliance with national policy. Thank you for your valuable input. | Yes | 01926 | Environment Agency |
| **RUR.08: Sloemans Farm** | The Environment Agency advises that a Groundwater Risk Assessment will be required for cemetery developments, in line with the guidance "Cemeteries and Burials: Groundwater Risk Assessments" and Section L of the Environment Agency's Approach to Groundwater Protection. The guidance was updated on 2nd October 2023 to reflect revised regulations for new cemetery developments, as outlined in "Protecting Groundwater from Human Burials." This applies to Site SA RUR.08 (Sloeman's Farm). | The Council acknowledges the need for a Groundwater Risk Assessment in accordance with the updated "Cemeteries and Burials: Groundwater Risk Assessments" guidance and the Environment Agency's Approach to Groundwater Protection. We will ensure that developers are informed of these updated regulations and comply with the necessary assessments to protect groundwater from human burials. We appreciate your ongoing collaboration on this matter. | Yes | 01926 | Environment Agency |
| **RUR.08: Sloemans Farm** | LBESPS supports the allocation of Sloeman's Farm (SA RUR.08) for natural burial use. They endorse the proposed land use, infrastructure requirements for enhanced pedestrian and cycle connectivity, and the development timeframe of up to 5 years. They consider the site deliverable and prioritizable for development. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **RUR.08: Sloemans Farm** | The Enfield Society supports additional burial space, provided it minimally impacts the character of Whitewebbs Lane and the open landscape within the sensitive Enfield Chase Area of Special Character. They seek greater clarity around Design Principle F for the design of the vehicular entrance, to align with retaining existing hedgerows and long views. They argue that ancillary buildings, as mentioned in Design Principle G, are inconsistent with Green Belt policy and should not affect the rural character of Whitewebbs Lane. | Comments noted. The Enfield Local Plan's policy on employment floorspace is sound and aligns with the London Plan's spatial strategy and definition of 'good growth.' The policy integrates the London Plan's focus on regeneration, Opportunity Areas, and brownfield sites, including Meridian Water and New Southgate. The employment targets are supported by a robust evidence base, including transport modeling by WSP and the Enfield Employment Topic Paper. The strategic balance between housing and employment is designed to minimize environmental impact, particularly in sensitive areas like Chase Park and Crews Hill, which are addressed in their respective topic papers. Site allocations such as East of Junction 24 (SA RUR.04) and Land West of Rammey Marsh (SA RUR.03) are justified by exceptional circumstances, ensuring a sustainable development approach that preserves Enfield's character and heritage. | No | 01794 | Enfield Society |
| **Ommission sites** | Transport for London's separate response to the draft ELP provides additional details and specific points regarding the transport issues raised. | Comments noted. | No | 00120 | Greater London Authority (GLA) |
| **Ommission sites** | Historic England's Comments are detailed in ther response under Appendix B - Table of Comments on Proposed Allocations in the Pre-Submission Draft of the Enfield Local Plan. On Heritage Sensitivities: Historic England welcomes the inclusion of heritage considerations in each site allocation proforma. However, they believe that, due to the sensitivity of many of the broad locations, more detailed design principles should be provided. On consultation with GLAAS: Historic England notes that several proposed site allocations would require consultation with the Greater London Archaeological Advisory Service (GLAAS). They suggest adding a link to the GLAAS charter and recommending a note at the start of Appendix C to clarify when GLAAS consultation is required, such as for major planning applications, Environmental Impact Assessments, and significant alterations to historic buildings. On clarification of Colour Coding: Historic England observes that the green, amber, and red colour coding in the heritage considerations box on each pro forma is unclear and recommends providing clarification. | Comments noted. The Council appreciate Historic England's guidance on the importance of conserving and enhancing Enfield's historic environment. The Council will address their concerns by collaborating on a statement of common ground to ensure the Local Plan aligns with the National Planning Policy Framework (NPPF) and the Planning Practice Guide (PPG). | No | 01788 | Historic England |

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| **Ommission sites** | The NHS London Healthy Urban Development Unit (HUDU) acknowledges that Appendix C contains a detailed appraisal of all the site allocations. Also as above, as the needs of the NHS may change over time and ongoing consultation with the ICB is required to ensure that the delivery of the integrated Care Hub is the most efficient way to meet its priorities. For residential schemes over fifty dwellings where other health priorities have not been identified, the following wording is suggested under 'Infrastructure Requirements'.<br><br>….should liaise with the NHS early in the design process to identify the mitigation required in particular circumstances.<br><br>Where health provision has not been identified in the site allocation an additional point to the policy text is suggested:<br><br>should provide a contribution to health provision. | Comments noted. The Council greatly value the input from the NHS London Healthy Urban Development Unit, North Central London Integrated Care Board (NCLICB), and NHS providers. The Council is committed to working collaboratively with the NHS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | Yes | 01872 | NHS London Healthy Urban Development Unit |
| **Ommission sites** | Sport England would object to any land allocation that results in the loss or reduction of sports facilities, including playing fields, if it does not align with Sport England's Planning Policies or NPPF paragraph 103. They request the Council to highlight any such site allocations not previously identified. | Comments noted. The Council is committed to working collaboratively with Sport England other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01967 | Sport England |
| **Ommission sites** | Telereal Securitised Properties GP Limited proposes the allocation of the Edmonton Telephone Exchange site (Sterling Way, London, N18 1QU) for residential-led redevelopment within the emerging Angel Edmonton Placemaking Area. The site is in a sustainable location with strong transport links and constitutes brownfield land. With its current form, scale, and massing (part-3, part-5, part-7 storeys), it is suggested that the site can deliver approximately 180-200 new homes, subject to detailed feasibility studies. The redevelopment would align with the Council's vision for the Placemaking Area and help meet the housing need. The site is expected to become surplus to operational requirements by 2028-31, and the proposed allocation would prevent it from becoming underutilized post-closure. The site's existing access points and lack of significant environmental or heritage constraints further support its suitability for development. | Comments noted. The Council appreciates the call for sites submission and support for the Draft Policy PL4. While the council appreciates the potential of Telereal's site for residential-led redevelopment, the current strategic focus and identified sites within the Local Plan are prioritized for meeting housing needs. The council welcomes the opportunity for it to come forward as a windfall site, aligning with our ongoing objective of flexible and sustainable development. | No | 01728 | Telereal Securitised Properties GP Limited |
| **Ommission sites** | Telereal Securitised Properties GP Limited, on behalf of TT Group, submits representations regarding the Edmonton Telephone Exchange site, located in the Angel Edmonton Placemaking Area. The site is expected to become surplus to operational requirements by 2028-31, and given its location in a tall buildings zone, it is well-suited for residential-led redevelopment. Telereal welcomes the Draft Local Plan's vision for Angel Edmonton but urges the Council to be more ambitious with height and massing in Placemaking Areas to maximize brownfield land use. They recommend a late-stage site allocation for the Edmonton Telephone Exchange in Appendix C to prevent it from becoming underutilized post-closure. This would support the Council's housing targets and align with national policy for sustainable development. | Comments noted. The Council appreciates the call for sites submission and support for the Draft Policy PL4. While the council appreciates the potential of Telereal's site for residential-led redevelopment, the current strategic focus and identified sites within the Local Plan are prioritized for meeting housing needs. The council welcomes the opportunity for it to come forward as a windfall site, aligning with our ongoing objective of flexible and sustainable development. | No | 01728 | Telereal Securitised Properties GP Limited |
| **Ommission sites** | A Call for Sites submission is made for the inclusion of Trent Park Golf Club, located on Bramley Road, within the Enfield Local Plan. This 26-hectare site offers significant potential for residential development as part of the broader Chase Park masterplan. The adjacent Chase Park allocation currently proposes 3,755 dwellings across 166.38 hectares, resulting in a low-density scheme of 23 dwellings per hectare. Applying a similar density to the golf club site could deliver up to 572 dwellings, subject to masterplan considerations, with delivery possible within the first five years of the plan period.<br><br>The site also provides an opportunity to enhance open space, recreation, and active travel infrastructure, offering improved pedestrian and cycle linkages from Chase Park to Oakwood Station, Snakes Lane, and Trent Park Country Park. Given the decline in viability as an 18-hole public golf course—evidenced by a | Comments noted. The Council acknowledges the potential for residential development, open space enhancement, and improved connectivity through active travel infrastructure as part of the broader Chase Park masterplan. We also recognize the declining viability of the 18-hole golf course and the proposal to reduce it to 9 holes, which presents an opportunity for alternative land use. Your proposal will be carefully considered, taking into account its strategic location, contribution to housing delivery, and alignment with sustainable development objectives. | No | 01741 | Trent Park Golf Club |

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| | 60% reduction in rounds played and a corresponding decline in green fee revenues over the past 30 years—the Community Golf and Leisure Trust is proposing to reduce the course to 9 holes, which would return a portion of the land to Enfield Council. This creates a timely opportunity to reconsider the allocation of the site, either as an extension of the Chase Park development or as a complementary component within a wider masterplan.<br><br>The site's strategic location, combined with its development potential, makes it a valuable asset for meeting Enfield's housing and infrastructure needs while enhancing recreational and environmental amenities. It is recommended that Trent Park Golf Club be included in the Local Plan to facilitate its contribution to the borough's sustainable growth objectives. | | | | |
| **Ommission sites** | Places for London are the freehold owners of Land at Palmerston Crescent and Bowes Road (Nl3 4UN). This brownfield former highways site would support the delivery of well connected residential development within O -5 years. The 2023 HELAA identifies that the site has an indicative capacity of c. 18 units. However, the emerging building typologies along Bowes Road in this location may mean that the site could support significantly more units in a medium rise development. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **Ommission sites** | Places for London are at an early conceptual stage of considering potential options for this site and testing whether it is possible or viable to co-locate residential accommodation alongside the existing operational depot and sidings facility and the other associated uses on the site. This is a challenging site from an operational perspective but might be a site we wish to take forwards as part of the next iteration of the Local Plan, once this draft version of the Local Plan has been adopted and is being reviewed. This would need to be subject to further discussion and testing with our operational colleagues. Any future development would need to ensure the continuity of operation of the depot and sidings. It would also need to avoid impacting the efficiency of running the Piccadilly Line or undermining the potential future expansion in operational capacity which will be required alongside the Piccadilly Line Upgrades. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |
| **Ommission sites** | Places for London retain long leasehold ownership of Bush Hill Park Station Car Park, a 0.2-hectares landholding which we promoted within previous Enfield Call for Sites (February 2021) and Enfield Local Plan Main Issues and Preferred Approaches (June 2021) consultations, providing the following information:<br>'The capacity of the site is to be determined. As a site that is adjacent to a station and within a Local Centre, which provides access to local shops, services, and amenities, it is proposed that the site may be capable of supporting higher density development, including tall buildings, in optimising the site's capacity. This would be subject to a design led approach and consideration of design options to determine the most appropriate form of development that responds to the site's context, capacity for growth and existing and planned supporting infrastructure capacity'. Bush Hill Park Station Car Park is identified within the Enfield Local Plan HELAA 2023, as an available, suitable, achievable, and developable landholding. Furthermore, the Enfield HELAA stipulates a 'baseline' indicative capacity of 15 residential dwellings deliverable within 6- 10 years, an increase from 13 residential dwellings in the HELAA 2021. On account of the site's capacity to deliver residential accommodation within a locality adjacent to sustainable public transport and local amenities, Places for London strongly recommend this site's inclusion and allocation within the Enfield Local Plan. It should also be noted that further feasibility work may indicate that the capacity of the site may exceed this quantum. | Comments noted. The council acknowledges the importance of collaboration and agrees to work together with Places for London. We will formalize our mutual understanding and agreements through a Statement of Common Ground, ensuring that all recommendations and concerns are addressed cohesively within the planning framework. This collaborative approach will help us effectively accommodate growth, enhance sustainable travel, and support higher density development in areas with high transport accessibility. | No | 01937 | TfL Places for London |

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| **Ommission sites** | LBESPS supports the preparation of the new Enfield Local Plan, aiming to achieve site allocations and effectively utilize LBE Landowner sites to align with the Council's vision and objectives. They find the draft Local Plan positively prepared and their comments aim to support the plan-making process to ensure a sound and legally compliant Local Plan. LBESPS supports the site allocations and recommends that the site policies' development targets, design criteria, and phasing be flexible to accommodate detailed site assessments and market conditions in future planning applications. | Comments noted. The Council is committed to working collaboratively with LBESPS and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 01946 | LBE Strategic Property |
| **Ommission sites** | The Diocese of London has submitted a representation promoting the land at Jesus Church, Forty Hill, for Green Belt release in the Enfield Local Plan. They argue that the site, comprising 16 hectares of grassland and woodland, does not fulfill the NPPF's primary Green Belt purposes and is suitable for development. They propose the land be allocated for residential use, addressing the borough's housing needs, particularly affordable family homes and elderly accommodation. Additionally, they suggest the site could be used for educational facilities such as expanding Forty Hill Primary School or providing SEND spaces, as well as for renewable energy through a solar PV facility or biodiversity net gain. The Diocese recommends further discussions to explore these development options, citing "exceptional circumstances" for Green Belt release. | The Council appreciates the Diocese of London's support for the plan's legal compliance and soundness, and we acknowledge their interest in participating in the examination hearings to advocate for their site as a potential solution to any needs shortfall. | No | 01744 | Diocese of London |
| **Ommission sites** | CPRE London criticises the omission of the large area of land south of the William Girling Reservoir from the Local Plan, arguing that this oversight makes the plan unsound. They emphasize the significance of this area, the largest protected open space in the borough, for the future of Enfield residents, particularly those in Edmonton and the new housing development at Meridian Water. CPRE and local groups have proposed a 'Banbury Reservoir Park' and are disappointed that the council has not included these plans in the Local Plan. They stress the need to address the serious deficiency of green space in the area and argue that the draft plan's limited mention of collaborating with Waltham Forest is insufficient. | Comments noted. The Council appreciates CPRE London's input regarding the omission of land south of the William Girling Reservoir from the Local Plan. As set out in the Site Allocation Topic Paper, sites were omitted based on various criteria, including deliverability, viability, and alignment with strategic objectives. The proposed Banbury Reservoir Park was not included due to constraints and feasibility issues. The Council remains committed to addressing green space deficiencies and collaborating with Waltham Forest to enhance the area's environmental quality, ensuring sustainable and inclusive development for all residents. | No | 01726 | CPRE London |
| **Ommission sites** | CPRE London emphasises that the Local Plan should clearly acknowledge the importance of front and back gardens for nature conservation and flood management objectives. | Comment noted. The Council acknowledges CPRE London's emphasis on the importance of front and back gardens for nature conservation and flood management. Gardens contribute significantly to urban biodiversity, providing essential habitats for wildlife and supporting ecological networks. Additionally, they play a crucial role in sustainable urban drainage systems, helping manage surface water and reduce flood risk. The Local Plan includes policies that recognize and support the multifunctional benefits of gardens, as justified in the Blue and Green Enfield Strategy and related evidence base, ensuring they enhance environmental objectives and resident well-being. | No | 01726 | CPRE London |
| **Ommission sites** | CPRE London recommends that the Local Plan should account for amenity green space needs per person, especially in areas experiencing population densification. | Comment noted. The Council appreciates CPRE London's recommendation regarding amenity green space needs per person, particularly in densely populated areas. The Local Plan recognizes the importance of green spaces in urban environments and aims to enhance these areas to support well-being and environmental sustainability. The Blue and Green Strategy outlines our commitment to increasing green spaces, ensuring equitable access for all residents, and addressing the needs of growing populations through strategic green infrastructure planning. This approach aligns with our broader objectives for sustainable urban development and community health. | No | 01726 | CPRE London |
| **Ommission sites** | CPRE London considers the following sites in Enfield could be considered for tree planting and woodland creation to contribute to a London Tree Ring Community Forest:<br>North Enfield to Epping Forest<br>ENF001 Enfield Island Village<br>• Location: Google maps link<br>• Ownership: Enfield Council<br>• Classification: MOL<br>• Site Information: Approximately 30% of the site can be converted into accessible | Comments noted. The Council appreciates CPRE London's identification of potential sites for tree planting and woodland creation. These sites, including Enfield Island Village (ENF001), Aylands Open Space (ENF002), Bullsmoor Regional Open Space (ENF003), and Rammey Marsh (ENF004), align with Enfield's Blue and Green Strategy. This strategy emphasizes enhancing green infrastructure and biodiversity across the borough. Each site offers unique opportunities for woodland creation, natural flood risk reduction, and improving environmental quality. The Council will consider these recommendations to further | No | 01726 | CPRE London |

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| | woodland with paths.<br><br>ENF002 Aylands Open Space<br>• Location: Google Maps Link<br>• Ownership: Enfield Council<br>• Classification: MOL<br>• Site Information: The site is approximately 19.18 ha and is MOL.<br>The MOL lies near the northern edge of the borough and is formed of Belmore Fields open space, playing fields associated with the Lee Valley Academy, a play area, Aylands Allotments and other accessible open space.<br><br>ENF003 Bullsmoor Regional Open Space (Belmore Playing Fields)<br>• Location: Google Maps<br>• Ownership: Enfield Council<br>• Classification: MOL<br>• Site Information: Scope for expanding wooded margin around Yeading Brook and wider periphery tree planting or hedgerow creation or gapping up. Planting in this area may have potential positive impacts for natural flood risk reduction and improving water quality in the brook.<br><br>ENF004 Rammey Marsh<br>• Location: Google Maps Link<br>• Ownership: Enfield Council<br>• Classification: Greenbelt<br>• Site Information: The existing grassland and scrubland have biodiversity value, but there is scope for careful additional trees and wooded areas - especially around the periphery to screen roads and buildings, enhancing its rural feel and provide sound and visual barrier to nearby roads. | integrate green infrastructure into our planning efforts, supporting sustainable urban development and nature recovery. | | | |
| **Ommission sites** | CPRE London considers the following sites, could be considered for green spaces.<br><br>ENF005 Tottenhall Recreation Ground and Boundary Playing Fields<br>• Google Maps Link<br>• Ownership: Enfield Council.<br>• Classification: Greenbelt/MOL<br>• Site Information: There are two distinct clear patches on the site, and there's potential for further tree planting, including the extension of one of these wooded areas to help with creation of areas for shad breaks for sports players and fans. There is a significant opportunity for planting additional trees and hedgerows around the perimeter of the site.<br><br>ENF006 Tile Kiln Lane Open Space<br>• Location: Google Maps<br>• Ownership: Enfield Council?<br>• Classification: Greenbelt/MOL<br>• Site Information: Tree planting here could potentially contribute to natural flood risk reduction or improvements in water quality. Areas within the MOL that are not currently green but are fundamentally open land have the potential to be transformed into green spaces.<br><br>ENF007 Churchfields Recreation Ground<br>• Location: Google Maps<br>• Ownership: Enfield Council.<br>• Site Information: It is MOL. This site is located on the council's list as a potential wetland. It may have areas suitable for a tiny forest. More trees are needed on the perimeter. 4.42 ha<br><br>ENF008 King Georges Field<br>• Location: Google Maps<br>• Ownership: Enfield Council. | Comments noted. The Council acknowledges CPRE London's suggestions for enhancing green spaces in Enfield through additional tree planting and woodland creation at sites including Tottenhall Recreation Ground and Boundary Playing Fields (ENF005), Tile Kiln Lane Open Space (ENF006), Churchfields Recreation Ground (ENF007), King Georges Field (ENF008), Durants Park (ENF009), Montagu Recreation Ground (ENF010), Aldersbrook Avenue Rec (ENF011), Albany Park (ENF012), and Hoe Lane Open Space (ENF013). These recommendations align with Enfield's Blue and Green Strategy, which emphasizes the enhancement of green infrastructure and biodiversity. The potential for tree planting and creating green spaces supports our goals for natural flood risk reduction, improved water quality, and increased urban green spaces. | No | 01726 | CPRE London |

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| | • Site Information: More trees are needed on the perimeter, especially along the border with the playground next to A10. Approximately 30% of the site could be planted without loss of amenity value.<br><br>ENF009 Durants Park<br>• Location: Google Maps<br>• Ownership: Enfield Council.<br>• Classification: MOL<br><br>ENF010 Montagu Recreation Ground<br>• Location: Google Maps<br>• Classification: Unknown<br>• Ownership: Enfield Council<br><br>ENF011 Aldersbrook Avenue Rec<br>• Location: Google Maps<br>• Ownership: Enfield Council.<br>• Classification: Not Green Belt or MOL.<br>• Site Information: Very small possibility for tree planting around the edges of the park, but as it is a small site, it's quite limited.<br><br>ENF012 Albany Park<br>• Location: Google Maps<br>• Ownership: Enfield Council?<br>• Classification: MOL<br>• Site Information: Could increase woodland to 10-20% of the park's total area.<br><br>ENF013 Hoe Lane Open Space<br>• Location: Google Maps<br>• Classification: MOL<br>• Ownership: LB Haringey<br>• Site Information: Woodland around the periphery which could be increased by around 10%. | | | | |
| **Ommission sites** | CPRE considers the following sites for Tiny Forests (all owned by Enfield Council)<br>ENF014 Elsinge Park<br>• Location: Google Maps<br>• Site Information: Possibility for expanding woodland to about 10% of the park's cover in the corner<br>closest to Cracknell Close.<br><br>ENF015 Manor Court<br>• Location: Google Maps<br><br>ENF016 Kempe Rd Playing Fields<br>• Location: Google Maps<br><br>ENF017 Painter's Lane Open Space<br>• Location: Google Maps<br>• Small park, mainly used as a recreation area. The perimeter already has woodland surrounding it –<br>maybe scope to widen this to increase tranquility within the space.<br><br>ENF018 Jubilee Park<br>• Location: Google Maps<br>• Classification: MOL<br>• Site Information: Quite a large site with definite possibility to plant trees and increase the woodland cover in the park to around 10-20% of its land area. | Comments noted. The Council acknowledges CPRE London's suggestions for expanding woodland and creating tiny forests at several sites owned by Enfield Council, including Elsinge Park (ENF014), Manor Court (ENF015), Kempe Rd Playing Fields (ENF016), Painter's Lane Open Space (ENF017), Jubilee Park (ENF018), North Enfield Rec (ENF019), and The Dell (ENF020). These proposals align with Enfield's Blue and Green Strategy, emphasizing green infrastructure, biodiversity, and natural flood management. The Council remains committed to enhancing green spaces, ensuring sustainable development, and addressing climate change through tree planting and woodland creation. | No | 01726 | CPRE London |

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| | ENF019 North Enfield Rec<br>• Location: Google Maps<br>• Owned By: Enfield Council<br>• Site Information: This site is a spacious area, with approx. size of 48.96 ha, with a lovely avenue of horse chestnuts but few other trees. It includes rugby fields, tennis courts, and a football pitch.<br><br>ENF 020 The Dell<br>• Location: Google Maps<br>• Owned By: Haringey Council (?)<br>• Site Information: This site presents an excellent opportunity for woodland creation and appears to be managed with a view to getting the area de-designated and released for development. The site has been fenced off for about 5 years due to issues with fly-tipping. It is an extensive site with the potential to become an extensive new community woodland. | | | | |
| **Ommission sites** | The Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) has submitted the 'Land north of Lower Hill Lane Walkpath (N18) and south of William Girling Reservoir' as a proposed site for development. Whilst the site is owned by Thames Water, in the Green Belt land within the Lee Valley Regional Park, the site is envisioned as a new park featuring wetland habitat creation, flood mitigation, and a softer river edge. The EnCAF-LUWG's submission seeks to enhance sports, recreational, and community facilities, with a focus on activating the western edge along the Lee Navigation towpath by providing spaces for community activities, sports pitches, natural play areas, flat water canoeing, and refreshments. EnCAF-LUWG's submission also include new pathways, nature/fitness trails, and cycle routes to create a safe pedestrian and cycling connection to Edmonton Marshes within the next 5-10 years. EnCAF-LUWG's indicates that the site is intended to connect with both new and existing parks in LB Waltham Forest (referencing their pending Local Plan) and Edmonton Marshes, forming a cohesive park network to address the green space deficiency in this rapidly growing area. | Comment noted. This change is not considered to be necessary to make the policy sound. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **Ommission sites** | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) provides a map of Land North of Lower Hill Lane Walkpath (N18) and to the South of William Girling Reservoir to support their comments relating to PL5. | Comment noted. This change is not considered to be necessary to make the policy sound. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **Ommission sites** | The EnCaf Land Use Working Group (ELUWG) provides the CPRE Banbury Reservoir Park - Principles and Proposals. The Banbury Reservoir Park (BRP) proposal outlines the creation of a substantial new park in southeast Enfield to address the area's deficiency of accessible greenspace, particularly in Upper Edmonton. The park aims to promote health, biodiversity, and community engagement, while enhancing sustainable transport and mitigating environmental pressures. The proposal aligns with Enfield's Blue and Green Strategy and national policies, emphasizing the need for improved access to nature and recreation. BRP will consist of four main areas: the Northern Wetlands, Edmonton Marshes, Folly Lane Triangle, and Banbury Reservoir, each offering unique opportunities for recreation, habitat creation, and community use. Next steps involve finalizing principles, creating a delivery plan, and coordinating with stakeholders. | Comment noted. The principles and proposals for the Banbury Reservoir Park (BRP) are welcomed and the Council appreciates ELUWG's commitment to addressing the deficiency of accessible greenspace in southeast Enfield and promoting health, biodiversity, and community engagement. While we recognize that the BRP proposal aligns well with Enfield's Blue and Green Strategy and national policies focused on improving access to nature and sustainable transport, we must note that Banbury Reservoir is not within the boundaries of the London Borough of Enfield. The reservoir falls under the jurisdiction of the London Borough of Waltham Forest. As part of our Duty to Cooperate, we will continue to engage with LB Waltham Forest. We also encourage ELUWG to engage directly with Waltham Forest's planning department to explore how the Banbury Reservoir Park proposal could be incorporated into their Local Plan and strategic initiatives. | No | 01676 | Enfield Climate Action Forum - Land Use Working Group (EnCAF-LUWG) |
| **Ommission sites** | The Councillor for Southgate Ward expressed concern that the Draft Local Plan's vague wording in the site allocations which suggests the ASDA and M&S sites in Southgate could be developed into housing in the future. They argued that this | Comments noted. The sites mentioned are no longer allocated in the plan. | No | 01836 | Cllr Morreale |

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| | would harm the community, contribute to the decline of the high street, and leave Southgate without major supermarkets, potentially forcing residents to shop online. | | | | |
| **Appendix D: Tall Building** | | | | | |
| **Appendix D: Tall Building** | Winners Property Company Limited notes that Appendix D of the Draft Local Plan identifies areas potentially suitable for tall buildings (over 21m), emphasizing that inclusion in this list does not guarantee acceptability without a thorough assessment process. It underlines the necessity for proposals to meet high design standards. Nexus Planning on behalf of Miriam Investment Holdings, proposes extending the designated area for tall buildings to include Metro Point, located across Cockfosters Road from already identified sites. This prominent brownfield site, owned by our client, is immediately available for redevelopment and could help meet local housing needs. A detailed assessment has been submitted to the Council. | Comments noted. The Council acknowledge the site's potential for redevelopment and its strategic location adjacent to already identified areas. The Council will engage further by entering into a Statement of Common Ground (SoCG) with Miriam Investment Holdings to explore this proposal in detail, ensuring a thorough consideration of the site's suitability for tall buildings as part of our ongoing planning process. | No | 01764 | Winners Property Company Limited |
| **Appendix D: Tall Building** | Winners Property Company Limited notes that Appendix D of the Draft Local Plan identifies areas potentially suitable for tall buildings (over 21m), emphasizing that inclusion in this list does not guarantee acceptability without a thorough assessment process. It underlines the necessity for proposals to meet high design standards. Nexus Planning on behalf of Miriam Investment Holdings, proposes extending the designated area for tall buildings to include Metro Point, located across Cockfosters Road from already identified sites. This prominent brownfield site, owned by our client, is immediately available for redevelopment and could help meet local housing needs. A detailed assessment has been submitted to the Council. | Comments noted. The Council acknowledge the site's potential for redevelopment and its strategic location adjacent to already identified areas. The Council will engage further by entering into a Statement of Common Ground (SoCG) with Miriam Investment Holdings to explore this proposal in detail, ensuring a thorough consideration of the site's suitability for tall buildings as part of our ongoing planning process. | No | 01764 | Winners Property Company Limited |
| **Appendix D: Tall Building** | IKEA consider the plans at Appendix D, ambiguous and appear to apply an inflexible approach to dealing with sites on a scheme specific basis. Each of the Figures in Appendix D, there are specific annotations that appear to fix buildings to a "maximum height". It is important that the Plan is clear that the tall building plans are merely provided as guidance only and that the appropriateness of tall buildings in the areas will be dealt with at the development management stage (ie, planning applications). | Comments noted. In response to IKEA's concerns about the plans in Appendix D appearing inflexible and ambiguous regarding maximum building heights, the Site Allocation Topic Paper (2024) clarifies that these height guidelines are intended as indicative frameworks, not fixed requirements. The annotations provided are meant to guide development, especially in sensitive areas where local character and heritage are considerations. However, the final determination of building heights will be made during the development management stage, where individual planning applications are assessed on a site-specific basis. This approach ensures flexibility, allowing developers to propose tall buildings while ensuring that the local context and high design standards are respected. | No | 01921 | Ikea Properties Investments Ltd |
| **Appendix E: Developer Contributions** | | | | | |
| **Appendix E: Developer Contributions** | The Canal & River Trust generally aims to maintain its assets in a "steady state," with towpath maintenance based on current usage. When new developments are likely to increase usage, the Trust's maintenance liabilities will also rise. Therefore, it is reasonable to request financial contributions from developers either to cover the increased maintenance costs or to upgrade the towpath surface to a more durable standard that can handle increased usage without adding to the Trust's future maintenance burden. Additionally, there should be further clarity on the delivery of towpath improvements. While paragraphs 2.65-2.69 refer to walking and cycling, they do not mention the towpath or 'green loop.' This should be addressed for greater clarity. | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |
| **Appendix E: Developer Contributions** | The Canal and Rivers Trust noted that the Site Allocation Topic Paper references their land at Enfield Lock. They pointed out inaccuracies in the accompanying assessment, which incorrectly classified the entire site as Green Belt, while some of it is previously developed land. They emphasised the need for an updated proposals map for consultation that clearly shows the Trust's land to verify the Local Plan's details. The Trust welcomes further engagement with the Council to address this issue and to provide additional comments once a clearer map is available. | Comments noted. The Council is committed to working collaboratively with Canal & River Trust and other stakeholders to refine and update the Local Plan policies where necessary. We welcome the opportunity to enter into a Statement of Common Ground to ensure a shared vision and effective implementation of the Plan's objectives. | No | 02007 | Canal & River Trust |