

## Enfield Council's response to Inspector's IN1 Document

**1<sup>st</sup> November 2024**

### Council's introduction

1. To date the Council has provided two responses to [IN1]. These are dated 30<sup>th</sup> September and are in relation to:
  - PQ1a, PQ1b and PQ1d, and
  - PQ22
2. Then 24<sup>th</sup> October 2024 in relation to:
  - PQ2 – PQ4
  - PQ10 – PQ20
  - PQ47 and PQ61a.
3. These responses can be viewed in full on the Council's website at:  
<https://www.enfield.gov.uk/services/planning/new-enfield-local-plan>
4. This response [E3] (dated 1<sup>st</sup> November 2024) further responds to [IN1] and provides responses to the following PQs:
  - PQ5 – PQ9
  - PQ21
  - PQ24 and PQ25
  - PQ35 – PQ38
  - PQ46, and
  - PQ58
5. In addition, this response has the following associated Appendices and Annexes:
  - Appendix 1 – PQ5 – Statement of Common Ground with the Greater London Authority signed and redacted version [E3.1].
  - Appendix 2 – PQ5 – Conformity Topic Paper [E3.2].
  - Appendix 3 – PQ6 – Schedule setting out the relationship between the Enfield Local Plan Policies and the London Plan Policies [E3.3].
  - Annex 1 – PQ24 – 5 Year Housing Land Supply Excel spreadsheet [E3.4].
  - Annex 2 – PQ46 – Transport Topic Paper [E3.5].
6. The remainder of the Council's responses will be provided on or before 29th November. For the avoidance of doubt, these PQs response will address:
  - PQ23
  - PQ26
  - PQ29 – PQ34
  - PQ39 – PQ45
  - PQ48 – PQ57
  - PQ59, and

- PQ 60, PQ61b and PQ62
7. The Inspector's questions are shown below in ***bold italics*** with a border, following any preamble to the question in italics. The Council's responses are shown in normal typeface below the Inspector's questions.
  8. Main modifications arising from the Inspector's questions (where proposed) are set out in grey tint boxes.
  9. The Council further notes that the 'main modifications' suggested in response to the Inspectors' questions below are not the only ones that the Council has suggested to date. The schedule of suggested main modifications [DMOD1] is a live document and will be formally submitted to the Inspector on 29<sup>th</sup> November 2024.

## Responses to the Inspector's questions

### Representations

***PQ1. Could the Council: a) Continue to identify and resolve the issues identified with the representation database; b) Once completed, provide a note to me outlining the issues that have been identified, what has been done to correct them (if necessary) and whether there are any outstanding issues that have not been resolved; c) Subject to the above, produce a revised version of SUB12 which corrects any errors in the schedules and addresses the points raised above, and d) Provide a timetable for the completion of work covered under a)-d).***

#### Council's response:

#### PQ1c – update

10. The Council submitted all representations in full to the Inspector on 6 August 2024, as part of the formal examination process. Following this submission, the Council identified and was informed of issues relating to the accuracy and completeness of the representation database. The key issues identified include:
  - Representations Not Logged Correctly: Some representations were not accurately matched to the corresponding submissions.
  - Duplicate Representation Numbers: Multiple individuals were inadvertently recorded under a single representation number.
  - Unreceived Submissions: A number of representations submitted during the consultation period were not initially received by the Council.
  - Unavailable Representations on the Online Database: Some representations, though logged, were not accessible via the online database.
  - Unredacted Representations: Certain representations were published with partial or full personal information unredacted.

11. The Council is actively working to address these issues and has kept the appointed Programme Officer informed of progress throughout this process. Initially, the Council aimed to complete the corrections by 25 October 2024; however, an extension has been valuable in allowing a more thorough review and preparation of the revised database for publication.
12. A thorough review of the consultation database has now been completed and will be submitted as part of this response. The Council's review has focused on:
  - Ensuring all representations, including previously unlogged submissions, are accounted for in the revised database.
  - Correcting entries and undertaking necessary redactions to protect personal information.
13. During the review, it was identified that some representations were published without adequate redactions. This matter was reported to the Council's Data Protection Officer and the Information Commissioner's Office (ICO). Based on ICO guidance, the Local Plan Consultation database was temporarily removed from the Council's webpage while a comprehensive review and re-redaction of published files took place.

### **Current Status and Publication Updates**

14. The revised representations, database and Regulation 22 Statement [SUB12.1] will be provided under separate cover due to their file sizes.
15. The Council has worked closely with the independent Programme Officer, who engages directly with the Inspector, to ensure the database review has been conducted within an agreed timeline. This ongoing review is expected to have minimal impact on the progression of the examination. The Council appreciates the active participation of local interest groups and residents, whose feedback has been instrumental in refining the representation database.

### **Duty to Cooperate and General Conformity with the London Plan**

***PQ5. Could the Council confirm that the Plan and each specific policy is in general conformity with the London Plan? Where any policy is not considered to be in general conformity with the London Plan can the Council explain why and what is being done to address it (this could be presented as a separate 'Conformity Topic Paper')? A separate SoCG with the GLA should also be produced.***

#### Council response:

16. In response to the Inspector's Preliminary Question 5, the Council's approach includes two components: 1) the Statement of Common Ground (SoCG) with the Greater London Authority (GLA) [E3.1] and 2) a separate Conformity Topic Paper [E3.2], which are appended to this response as Appendices 1 and 2, respectively.
17. The **Statement of Common Ground (SoCG)** appended as Appendix 1 [E3.1] of this response, has been prepared in collaboration with the GLA to outline the areas of agreement and any ongoing matters under discussion regarding general conformity with the London Plan. Key issues discussed in the SoCG include conformity concerning tall buildings and Green Belt policies. The SoCG clarifies where modifications to the ELP have been

proposed to ensure alignment with London Plan standards, particularly for tall building policy refinements and related spatial considerations. Additionally, it outlines the ongoing dialogue regarding Green Belt boundaries, with both parties acknowledging that the exceptional circumstances required for Green Belt adjustments under Policy G2 will be addressed within the examination.

18. The **Conformity Topic Paper** appended as Appendix 2 [E3.2] of this response, further elaborates on how each policy in the ELP has been assessed in relation to its alignment with the strategic direction set by the London Plan. This document is designed to confirm the areas where the ELP adheres to the general conformity requirements, and it discusses specific modifications to enhance policy alignment. For instance, this Topic Paper describes the Council's approach to incorporating modifications on tall buildings and confirms that the ELP's policies, subject to main modifications, align with London Plan expectations. For the Green Belt, the Topic Paper outlines the Council's justification for proposed boundary adjustments, supported by evidence on exceptional circumstances and aligned with London Plan Policy G2, pending review by the Inspector.
19. Together, these documents ensure a comprehensive response to PQ5, demonstrating that the Council has actively engaged with the GLA to achieve conformity with the London Plan, wherever feasible, while clearly documenting any policy areas where soundness considerations remain for further examination.

***PQ6. In responding to the above question, could the Council also produce a schedule setting out which policy or policies in the London Plan are particularly relevant to each policy in the Plan (where applicable)?***

Council response:

20. The Council has prepared a schedule in response to PQ6. This can be viewed in Appendix 3 [E3.3] to this response. As requested, the Council has sought to identify those London Plan policies that are particularly relevant to each policy in the ELP. For some of the policies in the ELP, in particular those relating to the spatial strategy and places, there are numerous London Plan policies that are of some relevance, but the Council has focused just on the policies of particular relevance.

### **Site Selection Methodology**

***PQ7. Which sites or allocations are considered to be 'strategic' in the context of paragraph 4.7 of the Site Allocation Topic Paper?***

Council response:

21. Paragraph 4.7 of Appendix 1 of the Site Allocation Topic Paper [TOP2] (under the sub-heading of "Strategic Sites"), states as follows:

*"In addition to identifying suitable allocations, there was a need to consider the opportunity to achieve a sustainable strategic release of land as part of the spatial strategy, in order to meet our housing targets. Strategic site options provide an opportunity to create large scale comprehensive developments that could support the provision of significant infrastructure*

*improvements. The appraisal of the strategic options and reasonable alternatives is covered in the Integrated Impact Assessment.”*

22. In this context, the Council is referring only to the Crews Hill and Chase Park strategic allocations, as set out below:

**PL10: Chase Park**

SA10.1	Chase Park South
SA10.2	Arnold House (66 Ridgeway) & Land to the rear of 66 The Ridgeway (west)
SA10.3	Chase Park North East
SA10.4	Chase Park North West

**PL11: Crews Hill**

SA11.1	Land north of Cattlegate Road, Crews Hill
SA11.2	Land south of Cattlegate Road, Crews Hill
SA11.3	Land South of M25, Crews Hill
SA11.4	Land North & South of Cattlegate Road, Crews Hill
SA11.5	Land south west of Theobalds Rd, Crews Hill
SA11.6	Land east of Theobalds Rd, Crews Hill

23. To be clear, all of the place-making policies (PL1-PL12) are strategic policies, but specifically in relation to paragraph 4.7 of the ELP, the Council is referring to the sustainable strategic land releases proposed at Crews Hill and Chase Park.

***PQ8. Could the Council confirm whether ‘strategic sites’ were assessed using the process set out in Table 1 of the Site Allocation Topic Paper? If not, on what basis were the ‘strategic sites’ identified and assessed?***

Council response:

24. Yes, the “strategic sites” at Crews Hill and Chase Park were assessed using the process set out in Table 1 of the Site Allocations Topic Paper [TOP2]. This was both as broad locations

and as a series of individual land parcels as identified via the HELAA [HOU1]. This is confirmed in the Exceptional Circumstances Topic Paper [TOP5] at paragraph 4.36, where it states:

*“The selective release of Green Belt land has been informed by a site selection process (see Site Selection Topic Paper), which prioritised sites best able to contribute to promoting sustainable patterns of development. Appendix 1 of the Site Allocations Topic Paper sets out the site assessment process in Table 1, with the second stage of the process being “promoting a sustainable pattern of development”.*

25. As set out in paragraph 4.7 of Appendix 1 to the Site Allocations Topic paper [TOP2], Stage 2 of the assessment process also included consideration of the spatial strategy options, including the opportunity to achieve a sustainable strategic release of land. The appraisal of these strategic options and reasonable alternatives to them is set out in the Integrated Impact Assessment (IIA) [SUB8] alongside assessment of the individual sites now allocated.
26. The findings of the site assessment work, and overall justification for the site allocations that make up the placemaking areas of Crews Hill and Chase Park are set out at Appendix 2 of the Site Allocation Topic Paper [TOP2].

**PQ9. Could the Council confirm whether employment sites went through the same assessment process as set out in Table 1 of the Site Allocation Topic Paper?**

Council response:

27. The Council confirms that employment sites underwent the same assessment process as outlined Table 1 of Appendix 1: Site Selection Methodology within the Site Allocation Topic Paper [TOP2].
28. However, for employment sites, capacities were derived using an 'industrial typology' approach to estimate theoretical capacity (EMP 3 & 4). These initial capacities were then refined through viability testing of these typologies (EMP 2) and adjusted based on the quantum and format proposed by developers. For office space, the Borough's office need was allocated primarily to new, large, housing-led developments at Meridian Water, as detailed in paragraphs 3.52-3.56 of the Employment Topic Paper [TOP4]. Meridian Water is designated as a new Town Centre and is a focal point for population and housing growth within this plan.
29. This approach ensured that employment site capacities were both realistic and aligned with broader strategic goals.

**Other groups in the community**

**PQ21. With regard to paragraph 63 of the NPPF:**

**a) Has any assessment been made of the strategic need for student accommodation, including needs generated in other areas? If not, what are the reasons for this?**

**b) Has any assessment of the needs of houseboat dwellers been undertaken? If not, what are the reasons for this?**

**c) How does the Plan seek to accommodate the needs identified for older people?**

Council response:

PQ21a

30. The Local Housing Needs Assessment (LHNA) 2020 [HNE2] (paragraph 7.46) confirms as follows:

*“According to the 2011 Census there were 236 people living in communal educational establishments. Given the small size of the student population currently, this LHNA has not undertaken an assessment of the needs of this group.”*

31. This position is reaffirmed at paragraph 8.70 of the ELP.

32. The small size of the higher education student population is a reflection of the fact that there are no Higher Educational establishments registered with the Office for Students in Enfield. There are a number of further educational establishments in Enfield, however these are not considered to contribute to student housing need.

33. The 2021 Census Data confirms that there were 1,878 residents of communal educational establishments, but this is still a relatively small student population, in a Borough with nearly 335,000 residents.

34. In terms of the need for student accommodation generated in nearby areas, there have been no requests from any neighbouring boroughs for Enfield to accommodate any unmet student housing need.

35. No representations from higher education establishments seeking student accommodation in Enfield have been received at either Regulation 18 or Regulation 19 stage, and no sites have been submitted specifically for student accommodation.

36. Further, Policy H9: Student Accommodation, provides a supportive policy framework to meet the needs of this group.

PQ21b

37. No assessment has been made of the needs of houseboat dwellers. Valuations Office Agency Data<sup>1</sup> shows that as of 1st April 2022, there were around 40 households within the Borough residing in a caravan, houseboat or mobile home. As such, an assessment of the needs of houseboat dwellers was not considered proportionate.

38. The Canal and River Trust has produced a London Mooring Strategy<sup>2</sup> which provides an overview of the number of people living on boats on the canal network and identifies zones for potential additional moorings. ELP Policy BG9: Watercourses, paragraph 3, provides a

<sup>1</sup> [https://assets.publishing.service.gov.uk/media/628ce0fdd3bf7f1f433ae1e0/CTSOP3.0\\_time\\_series.xlsx](https://assets.publishing.service.gov.uk/media/628ce0fdd3bf7f1f433ae1e0/CTSOP3.0_time_series.xlsx)

<sup>2</sup> <https://canalrivertrust.org.uk/about-us/where-we-work/london-and-south-east/boating-information/boating-facilities/london-mooring-strategy>



supportive policy framework for residential moorings (including in the zones identified for additional moorings in the London Mooring Strategy), should proposals come forward during the Plan period.

PQ21c

39. The Planning Practice Guidance (PPG) on Housing for older and disabled people provides that:

*" Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period."*

40. The LHNA 2020 [HNE2] identifies the need for more specialist older person accommodation in Enfield to reflect the growing number of older people. Overall, the need for residential care (C2 planning use class) is projected to increase to 755 bedspaces by 2036 and specialist older person housing (C3 planning use class) by 1,242 units.

41. In line with the PPG, Policy DM H5 provides a clear policy framework for meeting needs during the plan period and for considering applications for the kinds of housing that this population is likely to require. The plan also sets out a requirement for 10% of new dwellings to be built to wheelchair accessible M4(3) standard in line with the London Plan, which will help to address the need for homes suitable for the elderly, alongside a requirement for 20% of new properties to consist of 2 bedrooms, which could help to address the needs of older downsizers.

42. The ELP also allocates a number of specific sites and broad locations where specialist accommodation for the elderly is encouraged. These include:

- SA10.1 Land at Chase Park South which features this use under land use requirements on Page 436 of Appendix C: Site Allocations, with a scheme consented on the site for 95 care home bed spaces.
- Site SA URB.11: The Former Royal Chace Hotel is also allocated for an older person's care home comprising 92 care home bedspaces, however, this site is now close to completion, and therefore the proposed main modifications include deleting the site allocation.
- Policy PL10 Chase Park Placemaking Area also states that "development proposals...must include...specialist accommodation, including older persons housing, in accordance with policy DM H5 (supported and specialist housing).
- Policy PL11 Crews Hill Placemaking Area also states that "development proposals...must include...specialist accommodation, including older persons housing, in accordance with policy DM H5 (supported and specialist housing).

43. The Council has not chosen to set an indicative figure or range for number of units within the ELP but consider that the plan's ambitious housing requirements and positive policies, which



encourage both area specific and windfall schemes for specialist housing to meet the needs identified for older people, provide a sound basis for meeting these needs.

### **Other documents and evidence – Housing Trajectory**

***PQ24. Could the Council complete the site delivery schedule set out in Appendix 1<sup>3</sup> for each site included in the five-year supply?***

#### Council response:

#### **Summary**

44. The Council has prepared an updated calculation of its five-year land supply, this can be found within Annex 2 of this response. All of the sites included in the 5-year delivery schedule are 'category A' sites in that they either have detailed planning permission or are not major sites. In the absence of clear evidence to the contrary they are all considered to be deliverable within the meaning of the NPPF. The Council is currently updating its longer-term land supply and housing trajectory and will share this with the Inspector in due course. The Council considers it would be helpful to provide the following additional commentary on the updated housing land supply statement.

#### **Housing requirement**

45. Enfield's housing requirement as set out in the London Plan (2021) is to deliver 1,246 net new homes per year, or 6,230 homes over 5 years. The 2022 Housing Delivery Test (HDT) measurement showed that between 2019/20 and 2021/2022, the Council met 73% of its London Plan housing target based on the Housing Delivery Test. As such, the council is required to add a 20% buffer of 1,246 homes to its 5-year housing land supply, equating in total 7,476 homes.

#### **Backlog in delivery since 2019**

46. The shortfall in delivery since the beginning of the London Plan period (2019) of approximately 2,500 homes is now proposed to be delivered according to the Liverpool Method, i.e., spread over the remaining plan period beyond the first five years, representing a material change from the position at submission. Due to the lead-in times for large scale development sites in Enfield, the Council is proposing a stepped trajectory based on this approach which will enable a 5-year supply of deliverable sites at adoption.

#### **Windfall on small sites under 0.25 hectares**

47. The Council is also proposing to update the allowance it makes for windfall delivery. With five years of historic trend data now available on small site delivery in Enfield since the publication of the London Plan, the Council can now confirm that the 353 dwelling per annum small sites windfall allowance set out in the London Plan is supported by recent evidence of delivery. This is included from Year 3 of the plan and contributes to the five-year land supply calculation.

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<sup>3</sup> Appendix 1 refers to the Inspector's Preliminary Matters and Questions [IN1]

## Appendix 1A. position

48. The most up-to-date position on housing supply in April 2024 a change in base date to April 2024 is shown in the five year housing land supply excel spreadsheet [E3.4] and Table 1 below and represents a decrease on the position set out in the Housing Topic Paper [TOP3] which was published in August 2024. Table 1, set out below, provides a breakdown of the 5 Year Supply. Based on current consents and the projected delivery of allocated sites (including small sites), Enfield can demonstrate a deliverable supply of 3.66 years of deliverable land supply. This calculation will form the basis of a proposed modification requesting a stepped trajectory to ensure the ELP can demonstrate five years of deliverable supply at adoption.

**Table 1:** Five year housing land supply calculation as at April 2024

<b>A</b>	Annual housing target 2019-2029 based on London Plan target:	1,246
<b>B</b>	Five-year requirement	$(1,246 \times 5) = 6,230$
<b>C</b>	plus 20% buffer as a result of HDT result (2022 = 73%)	$(4,984 \times 1.2) = 7,476$
<b>D</b>	Deliverable land supply	5,468 including 1,059 homes on unidentified small sites under 0.25 hectares in size (353 x 3 years)
<b>E</b>	Years of deliverable land supply against London Plan target+20% buffer	3.66 years

49. **Note on Appendix 1b:** Note that no sites are included under Appendix 1A as all sites benefit from detailed planning permission or sit under the threshold set out by the Inspector for the additional evidence.

## Other Matters

***PQ25. What implications, if any, does paragraph 22 of the NPPF have for the Plan?***

### Council response:

50. Paragraph 22 of the NPPF (2023) indicates that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities.

51. The Enfield Local Development Scheme [SUB16] anticipates that the ELP will be adopted in 2025/26. The Council considers this to be a reasonable assumption, given that the ELP has

been submitted for examination, and the hearings are likely to commence in early 2025. On this basis and given that the ELP covers the period to 2041, the strategic policies will look ahead over a minimum 15-year period from adoption, in line with the first sentence of paragraph 22 within the NPPF (2023).

52. The ELP does include proposals for a new settlement at Crews Hill and a significant urban extension at Chase Park. Where a local plan includes such larger scale developments, paragraph 22 of the NPPF (2023) advises that policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
53. The ELP includes specific visions for Crews Hill (ELP page 104) and Chase Park (ELP page 90), which look ahead to completion of these developments (i.e. beyond the Plan period). For example, in relation to Chase Park, whilst around 2,550 dwellings are expected to be completed by 2041, the vision for Chase Park looks further ahead to when the urban extension is completed, and some 3,700 new homes have been delivered.
54. Overall, the Council consider that the approach taken in the ELP is consistent with the guidance at paragraph 22 of the NPPF (2023), in that the visions for Crews Hill and Chase Park look sufficiently far ahead to take account of the anticipated timeframes for delivery of these large-scale developments.

## Housing

***PQ35. For the avoidance of doubt, are the affordable housing requirements in part 2 of Policy H2 based on the proportion of habitable rooms or units?***

### Council response:

55. The affordable housing requirements in part 2 of Policy H2 are based on habitable rooms.
56. The Council recognise that Policy H2 (part 2) could have been drafted with greater clarity. It refers to the aim for 50% of all new homes to be affordable, but for this to be 'based' on habitable rooms. The second paragraph of Policy H2 refers to "affordable housing requirements being calculated based on proposed gross housing floorspace...". Further, paragraphs 2a, 2b and 2d refer to "50% affordable housing" and 2c to "35% affordable".
57. The proposed ELP explanatory text (paragraphs 8.20 and 8.21) provide limited guidance on the Council proposes calculating the affordable housing requirement on any given scheme.
58. The Council notes that the London Plan has the following explanatory text at paragraph 4.5.3 (relating to London Plan Policy H5: Threshold Approach to Applications):
59. "The percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. If this is not the case, it may be more appropriate to measure the provision of affordable housing using habitable floorspace. Applicants should present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison."

60. Having discussed the issues with the Council's Development Management team, the Council maintains that is appropriate to base its affordable housing requirements on habitable rooms. However, as above, the Council recognise that Policy H2 could have been drafted with greater clarity, and would therefore like to propose some modifications under PQ23, as follows:

1. The Council will actively work with Registered Providers to maximise the provision of affordable housing in the Borough and will aim to secure 50% of all new homes, ~~based on habitable rooms,~~ over the plan period as genuinely affordable.
2. Affordable housing requirements will be calculated based on habitable rooms ~~proposed gross housing floorspace~~ and will be applicable to new developments on sites that comprise ten or more new housing units or a combined proposed gross floorspace exceeding 1,000 square metres. The specific requirements are as follows:
  - a) for developments on industrial land that would result in a net loss of industrial floorspace, a minimum of 50% affordable ~~housing~~ is required;
  - b) On former Green Belt sites, including the proposed rural placemaking areas at Crews Hill and Chase Park, a minimum of 50% affordable ~~housing~~ is required;
  - c) For all other major housing developments, a minimum of 35% affordable ~~housing~~ is required;
  - d) on publicly owned land subject to suitable portfolio agreements aimed at achieving a minimum of 50% affordable across a mix of sites

61. In addition, the Council would like to propose some additional supporting text to Policy H2, that will be based on the London Plan approach (paragraph 4.5.3). The precise wording of this additional text will be set out within the forthcoming modifications schedule to be provided in response to PQ23.

***PQ36. Notwithstanding the provisions of Part 1a of Policy H3, could the Council confirm what evidence part 1g is underpinned by and whether it is considered up to date?***

Council response:

62. The policy is based on the Local Housing Needs Assessment (LHNA) (2020) [HNE2], specifically Table 8.2. However, it is important to note that evidence of housing need is not the only relevant consideration in this area of policy. Evidence of development viability as well as wider planning priorities and objectives held by the Council are also important to take into account.
63. The LHNA 2020 [HNE2] is considered to be up to date. There is no definition describing whether evidence is up to date in national policy or guidance. It is clearly a matter of planning judgement whether a piece of evidence is materially out of date. Furthermore, there is limited guidance in either national policy or guidance on how to prioritise homes appropriate for families in new development, but this is a locally identified priority in Enfield.

64. Therefore, the LHNA [HNE2] provides clear evidence of the requirement for family housing, as defined by the London Plan, and this has been translated into a clear policy requiring a minimum proportion of family housing in new developments, alongside housing suitable for other groups.

**PQ37. Could the Council confirm whether there are any designated neighbourhood areas within the Borough and, if so, whether the requirements of paragraph 67 of the NPPF have been met?**

Council response:

65. There is only one designated Neighbourhood Area within Enfield Borough, Hadley Wood in the North West corner of the borough. There was an application for an Angel Edmonton Neighbourhood Forum made in 2016, but that application was withdrawn, and the forum was not designated. The Hadley Wood Neighbourhood Forum was redesignated in January 2021 and the Hadley Wood Neighbourhood Plan was adopted by the council following a referendum in November 2023.

66. Paragraph 67 of the NPPF (2023) states that "Strategic policy-making authorities should establish a housing requirement figure for their whole areas, within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations".

67. Footnote 1 of ELP Policy SS1 states "The minimum requirement for the Hadley Wood Neighbourhood Plan area, in line with NPPF Paragraph 67, is 160 homes. Whilst a proportion of the borough's overall windfall is also likely to be delivered in Hadley Wood, it has not been possible to quantify this". Footnote 1 of Policy SS1 therefore meets the requirements of paragraph 67 of the NPPF (2023).

68. In any future review of the Hadley Wood NP, the ELP is not proposing any additional housing requirement, over and above ELP Site Allocation RUR.02, and the windfall development anticipated to come forward (as referenced in Footnote 1 to Policy SS1).

**PQ38. Could the Council confirm what proportion of the anticipated housing land supply would be made up sites no larger than 1 hectare (it is acceptable for this information to be provided as part of any revised housing trajectory referred to above)?**

Council response:

69. Paragraph 70 of the NPPF (2023) states that:

*"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*

*a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be*

*shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved”*

70. Paragraph 8.35 of the ELP outlines that approximately 6,920 new homes are anticipated to come forward on small sites in Enfield over the Plan period. There had been 1,516 homes completed on small sites in the period 2019-2022, and capacity for an additional 1,797 homes had been identified on small sites not meeting the threshold for allocation in the ELP. Further, an estimated 3,607 homes were expected to come forward on unidentified small windfall sites.
71. Table 8.2 of the ELP confirms an overall housing land supply of 34,710 homes. Therefore, upon submission, the plan comfortably met the small sites requirement set out in paragraph 70 of the NPPF (2023), with nearly 20% of all new housing provision over the Plan period to be delivered on small sites.
72. In updating the housing trajectory, it is very likely that there will be some variance in the above figures, but the Council is confident that it will still be able to comfortably exceed the 10% target set out in paragraph 70 of the NPPF (2023).

## Transport

***PQ46. Could the Council produce a brief Topic Paper outlining the main issues relating to transport matters. This should set out the strategic transport issues, provide a summary of the main transport evidence produced and the outcomes, what areas of significant transport infrastructure investment are needed to deliver the Plan, what status those infrastructure projects have (for example, are the funded or not), how the interventions have been factored into any viability assessments, what, if any, areas of dispute exist with the relevant highway authorities and what the Council is doing to address these?***

### Council response:

73. In response to PQ46, the Council's response is formalised in the Transport Topic Paper [E3.5] (Annex 2 of this response) for the Enfield Local Plan 2019-2041. In summary:
- **Strategic Transport Issues and Policies:** The Enfield Local Plan (ELP) outlines a strategic commitment to sustainable and decarbonised transport systems, active travel, and connectivity. The core policies (T1, T2, and T3) promote a modal shift away from private vehicles towards active and public transportation, in alignment with the Mayor's Transport Strategy and London Plan.
  - **Main Transport Evidence and Outcomes:** A comprehensive transport evidence base has been developed, including the Strategic Transport Assessment (STA), Infrastructure Delivery Plan (IDP), and Enfield Transport Strategy (2024). The transport modelling used multi-modal and highway models in line with TfL's guidelines. The outcomes identify necessary interventions, including targeted infrastructure for sustainable transit options, capacity enhancements, and road safety measures across key growth areas like Crews Hill, Chase Park, and Meridian Water.



- **Key Infrastructure Investments:** The ELP highlights essential investments such as upgrades to active travel networks, public transport infrastructure (including rail and bus services), and improvements to strategic and local highways. The IDP categorises these by priority, setting out “essential,” “important,” and “desirable” classifications to support plan delivery.
- **Funding and Viability Assessments:** Infrastructure requirements are included in viability assessments for the ELP, with cost per dwelling guidelines and funding options identified (e.g., Local Implementation Plans, TfL funding). However, some high-impact projects remain unfunded, and the Council will continue to pursue additional resources to ensure alignment with plan objectives.
- **Cooperation with Highway Authorities:** The Council has engaged in ongoing duty-to-cooperate discussions with Broxbourne Council, TfL, and National Highways. Issues include the feasibility of sustainable transport for certain site allocations and the alignment of modelling assumptions. The Council is working with these bodies to address outstanding concerns, including those around model calibration and potential bus network improvements at Crews Hill and Chase Park.
- **Timetable for Completion:** The transport evidence, database updates, and modelling refinements will be iteratively reviewed throughout the examination process.

## Appendices

***PQ58. In terms of Appendix C:***

***a) Are all aspects of the tables intended to be policy?***

***b) Are the inset maps meant to be read as policy? Are all the inset maps accurate and consistent with the key on page 361?***

***c) Is the scale of development expected on allocations in Appendix C consistent with what is set out in policies H1 and E1? If they are not, then please explain why.***

***d) What is the purpose of the coloured boxes for heritage and archaeology? What do the colours mean and how do they relate to policy?***

Council response:

PQ58a

74. No, not all aspects of the Site Proforma tables in Appendix C of the ELP are intended to be read as policy. Taking each header in the tables in turn:
75. The “Existing Site Information” simply confirms basic information about each site (address, site area, existing uses and current ownership). This information is not written as policy and is not intended to be applied as policy.
76. The “Site Considerations” briefly outline matters that should be taken into account when preparing a planning application. The “Site Considerations” are not intended to be exhaustive, but for all site allocations, confirm which flood zone the site is located within, the



accessibility of the site (PTAL rating), whether there are any heritage considerations, and whether development has the potential to impact on an Archaeological Priority Area. Again, this information is not written as policy. However, where heritage constraints or flood risk issues have been identified, these are addressed in the “Design Principles” section (and as set out below, the design principles are intended to be read as policy).

77. For example, in relation to Site SA7.4: Arnos Grove Station Car Park, the proforma (“Heritage Considerations”) references that the site is within the setting of a Grade II\* listed building, and the “Design Principles” section states that height must reduce towards the listed station building.
78. The “Land Use Requirements” text should be read as policy, as it sets out the land uses considered appropriate. For a number of sites, the “Land Use Requirements” include other land uses that are not referenced in Policy H1: Housing Development Sites, and E1: Employment and Growth. For example, the proforma for SA6.3: Minchenden Car Park & Alan Pullinger Centre, requires re-provision of the community use.
79. The implementation timeframes are indicative and are not intended to be read as Policy. These estimates align with the published Housing Trajectory (October 2024) and evidence in relation to employment land. To aid clarity, a minor modification could be made to the proforma tables, adding the word “Indicative” to the words “Timeframe for Delivery”
80. The “Infrastructure requirements” and “Design Principles” are intended to be read as policy. They provide an overview of the key infrastructure needed to support the proposed development (although this list is not exhaustive) and set out the key design principles for each site. The “Design Principles” should be read in conjunction with the policies set out in the ELP Chapters 3 to 15.
81. Policy H1: Housing Development Sites, and Policy E1: Employment and Growth, both currently cross reference to the site proformas included in the ELP at Appendix C. The Policies state that “The proformas carry the status of policy and indicate key requirements and considerations that need to be taken into account as sites come forward for development”. The Council considers that to aid clarity, the aforementioned text in Policies H1 and E1 could be amended to read:

*“The land use requirements, infrastructure requirements and design principles within the proformas carry the status of policy and indicate key requirements and considerations that need to be taken into account as sites come forward for development.”*

#### PQ58b

82. The inset maps contained with Appendix C of the ELP for each Site Allocation are not intended to be read as policy. These maps are illustrative and are intended to visually represent the design principles set out within each Site Allocation table.
83. To clarify that these maps are illustrative, the Council proposes a modification, to add a note to each map noting “Indicative Design Principles”.
84. The majority of the maps are consistent with the Key on page 361. The maps for Site Allocations 10.1, 10.2, 10.3, 10.4, 11.1, 11.2, 11.3, 11.4, 11.5 and 11.6 (i.e. the maps relating to sites at Crews Hill and Chase Park) are not consistent with the key, as these maps have been extracted from the Policies Map.

85. The Council is mindful of the need to take a consistent approach, and also of the need to avoid any conflicts arising between the “Indicative Design Principles” plans included at Appendix C for Crews Hill and Chase Park, and Figure 3.12 (Chase Park Placemaking Area – Illustrative Framework), and Figure 3.14 (Crews Hill Illustrative Spatial Framework).
86. The Council therefore considers that it would be appropriate to replace the current maps in Appendix C for the Crews Hill and Chase Park site allocations with, as appropriate, Figure 3.12 and Figure 3.14. For all of the Chase Park sites, Figure 3.12 will be reproduced in its entirety, but with the redline area for the corresponding proforma table overlain. The same approach will be taken towards Crews Hill (using the Figure 3.14). This approach will ensure that the maps in Appendix C for Crews Hill and Chase Park do not conflict with the framework plans in Chapter 3. A modification is also proposed within [DMOD1] to provide an explanation at the start of Appendix C alongside the Key. This will state:

*“This Key applies to all of the maps in Appendix C, with the exception of the maps for Site Allocations 10.1, 10.2, 10.3, 10.4, 11.1, 11.2, 11.3, 11.4, 11.5 and 11.6. For these Site Allocations the illustrative framework plans presented as Figures 3.12 and 3.14 have been used”.*

#### PQ58c

87. The Council has reviewed the figures presented in Appendix C and Policies H1 and E1 of the ELP and have identified the following editorial inconsistencies. Below sets out inconsistencies between Policy H1 and Appendix C. A number of editorial inconsistencies have been identified:

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

- Under Policy H1 the estimated capacity is referenced as 131, Appendix C references an estimated capacity of 133.
- The correct capacity is 133, Policy H1 should be updated to reflect this.

##### SA 3.2 Chiswick Road estate:

- Under Policy H1 the estimated capacity is referenced as 299, Appendix C references an estimated capacity of 146.
- The correct capacity is 146, Policy H1 should be updated to reflect this.

##### SA 3.3 Fore Street estate, formerly URB.24:

- Under Policy H1 the estimated capacity is referenced aligns with Appendix C, however it is referenced as URB.24. The site allocation should be renamed and located under Edmonton Green as it falls within this Place Making area.

##### SA 5.1 Meridian Water Phase 1

- Under Policy H1 the estimated capacity is referenced as 977, Appendix C references an estimated capacity of 978.
- The correct capacity is 978, Policy H1 should be updated to reflect this.

#### SA 5.3 Former Ikea, Meridian Water

- Under Policy H1 the estimated capacity is referenced as 1507, Appendix C references an estimated capacity of 1,500.
- The correct capacity is 1,507, Appendix C should be updated to reflect this.

#### SA 5.1 Meridian Water Phase 1

- Under Policy H1 the estimated capacity is referenced as 356, Appendix C references an estimated capacity of greater than 100 dwellings.
- The correct capacity is 356, Appendix C should be updated to reflect this.

#### SA 6.1 Southgate Office Village 286 Chase Road

- Under Policy H1 the estimated capacity is referenced as 200, Appendix C references 216.
- The correct capacity is 216, Policy H1 should be updated to reflect this.

#### SA 10.1 – 10.4

- Under Policy H1 the total estimated capacity is referenced as 2,550, Appendix C references 3,755 dwellings.
- The headline variance is that the correct total capacity is 2,550, Policy H1 should be updated to reflect this.

#### SA 11.1 – 11.6

- Under Policy H1 the total estimated capacity is referenced as 3,350, Appendix C references 3510 dwellings.
- The correct total capacity is 3350, Policy H1 should be updated to reflect this.

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

- Under Policy H1 the estimated capacity is referenced as 156, Appendix C references 115.
- The correct capacity is 115, Policy H1 should be updated to reflect this.

88. In terms of the inconsistencies between Policy E1 and Appendix C, these will be fully addressed in the schedule of Modifications [DMOD1] being prepared by the Council.




#### PW58d

89. The coloured boxes use a RAG (Red, Amber, Green) status, albeit with the addition of blue (as neutral), where there are no heritage or archaeology issues.

90. As above, the “Site Considerations” are not intended to be read as policy, but where site considerations in relation to heritage or archaeology have been identified, these are addressed in the “Design Principles” sections (which are intended to be read as policy).

91. The Council notes that three sites are given red RAG status for heritage – SA1.1: Palace Gardens, SA Urb 18: Land at Ritz Parade, and SA RUR.07: Whitewebbs Golf Course and Tottenham Hotspurs Training Ground. On reflection, the Council considers that this status could be misinterpreted. As all of the sites proposed for allocation have been subject to the Council's site selection methodology and have been found suitable for allocation, it is considered that the three sites referenced above should have their RAG status amended to Amber. This is not intended to suggest in any way that heritage matters are now less important for these sites – it is simply that Appendix C will then be more consistent. All of the sites allocated for development are considered deliverable, but particular consideration will need to be given to heritage matters where the RAG status is shown as Amber.

92. The table below sets out the specific definitions associated with each RAG status.

Heritage /Archaeological Priority Area RAG status definitions:	
	Heritage constraints; potential to develop; usual methodology for assigning indicative density <b>will not</b> apply; heritage impact assessment required; mitigation required
	Heritage constraints; potential to develop; usual methodology for assigning indicative density <b>may not</b> apply; heritage impact assessment required; mitigation required.
	No heritage constraints.

93. The Council would like to propose a modification to the ELP, to incorporate the above table alongside the Key on page 361 of Appendix C. This will be set out within [DMOD1].

## **Appendix 1: PQ5 – Statement of Common Ground with the Greater London Authority**

Please see document E3.1

## **Appendix 2: PQ5 – Conformity Topic Paper**

Please see document E3.2.

**Appendix 3: PQ6 – Schedule setting out the relationship between the Enfield Local Plan Policies and the London Plan Policies**

Please see document E3.3