



Enfield Local Plan (Regulation 24) 2024

Stage 1 Matters, Issues and Questions

Matter 1: Legal, procedural and other general matters

Wednesday 22 January

and

Friday 24 January 2025

London Borough of Enfield

Matter 1: Legal, procedural and other general matters

Issue 1.1: Duty to Cooperate (DtC)

Q1.1. Has the Council maximised the effectiveness of the Plan by engaging constructively, actively and on an on-going basis with neighbouring authorities and the other prescribed bodies on the relevant strategic matters and what form has this engagement taken?

Response:

1.1.1 Yes. The Council has maximised the effectiveness of the plan by engaging constructively, actively, and on an on-going basis with neighbouring authorities (both adjoining and otherwise) and other prescribed bodies on relevant strategic matters during the preparation of the ELP. This engagement has been undertaken in accordance with legal requirements including section 33A of the Planning and Compulsory Purchase Act 2004 and the principles outlined in paragraphs 24–27 of the NPPF (2023), ensuring that the plan-making process is effective and compliant with statutory requirements.

Engagement Process and Key Stages

1.1.2 From the early stages of plan-making, the Council recognises the importance of joint working to address both cross-boundary and strategic planning matters. The engagement process has evolved and informed the preparation of the Enfield Local Plan since it was launched in 2017 and included a range of activities such as formal meetings, written correspondence, thematic workshops, and the preparation of Statements of Common Ground (SoCGs). This iterative and multi-faceted engagement approach has enabled the Council to identify shared priorities, address cross-boundary issues, and respond to strategic matters effectively. Key areas of engagement contributing to the identification of shared priorities, include:

- Housing Need (including land availability),
- Employment, Town Centres,
- Strategic Transport,
- Historic Environment,
- Green Infrastructure and the Natural Environment,
- Water Management,
- Health and Social Care,
- Education, Sport and Recreation and
- Waste Management.

1.1.3 The form of engagement has been multi-faceted, including formal meetings, written correspondence, joint working groups, and the preparation of Statements of Common Ground (SoCGs). The Council held numerous meetings

and workshops during the plan-making process, consisting of one-to-one sessions, multi-agency discussions, and thematic workshops focused on key strategic matters. These meetings were documented by written exchanges, including formal letters and consultation responses, which ensured clarity and continuity in addressing cross-boundary issues. Joint working groups, such as the North London Waste Planning Group and Local London Partnership, provided additional platforms for collaborative engagement on shared priorities such as, waste management and economic development. Furthermore, the preparation of SoCGs formalised agreements and demonstrated the outcomes of these engagements.

- 1.1.4 Early engagement during the Regulation 18 stage focused on establishing housing and infrastructure needs in partnership with neighbouring authorities including Barnet, Waltham Forest, and Haringey. These discussions set out within the DtC Record (Appendix 1 of [SUB14a]) identified shared challenges and opportunities, such as addressing housing targets, managing flood risks, and supporting economic growth. Simultaneously, the council worked closely with the Greater London Authority to ensure alignment with the London Plan and to confirm that unmet housing needs could not be accommodated in adjacent boroughs. This early dialogue laid the foundation for housing policies that respond to both local and regional priorities.
- 1.1.5 Engagement with Hertfordshire and Essex County Councils addressed critical issues related to transport infrastructure and green belt management, ensuring that regional implications of growth were considered. The Council also maintained regular discussions with the North London Planning Group, which provided a forum for addressing shared challenges related to housing delivery, infrastructure provision, and environmental management.
- 1.1.6 As the Plan progressed, the Council's collaboration extended to key stakeholders, such as Transport for London (TfL), the Environment Agency, and Thames Water. Joint working with TfL resulted in strengthened transport policies that prioritise active travel and public transport infrastructure. Similarly, engagement with the Environment Agency and Thames Water (in March 2021 and August 2023) facilitated the integration of robust flood risk and water management strategies into the Local Plan. These partnerships not only ensured compliance with national guidelines but also enhanced the Plan's ability to address local challenges.
- 1.1.7 The Council also worked closely with Natural England and Historic England to develop policies that safeguard and enhance Enfield's natural and historic environment. For example, this engagement informed the Recreational Mitigation Strategy for the Epping Forest Special Area of Conservation (SAC) [INF1] and supported the integration of Biodiversity Net Gain into the Plan's policies. The Council's commitment to addressing strategic matters collaboratively is further evidenced by its work with the NHS and Sport England to ensure that health and recreational infrastructure aligns with the borough's growth strategy.

- 1.1.8 Employment policies benefitted from joint work with Functional Economic Market Area (FEMA) [EMP5] authorities, leading to strategies for industrial intensification and economic resilience. Furthermore, flood risk and environmental policies were updated in response to Environment Agency feedback, ensuring alignment with national guidelines.
- 1.1.9 The Council has documented engagement activities, with meeting agendas, minutes, and follow-up actions. These records, summarised in the DtC Statement [SUB14a], provide evidence of the constructive and iterative nature of the engagement process. Throughout the plan-making process, the Council has formalised these collaborative efforts through the preparation of SoCGs, which outline areas of agreement and any unresolved issues with prescribed bodies and neighbouring authorities. Signed SoCGs with the GLA, the Environment Agency, Natural England, TfL, and others demonstrate the outcomes of this engagement. Recent updates, such as the revised SoCG with the GLA signed in November 2024, reflect ongoing dialogue and the Council's commitment to addressing outstanding matters ahead of the examination hearings.
- 1.1.10 The effectiveness of the ELP has been maximised by ensuring that policies are robust, evidence-based, and aligned with strategic priorities. For example, collaboration with FEMA authorities has supported strategies for industrial intensification and economic resilience, while joint working with TfL has addressed concerns about car dependency and accessibility in key development areas. Feedback from Natural England and the Environment Agency has strengthened policies on green infrastructure and flood risk management, ensuring their alignment with best practices.
- 1.1.11 Evidence of this engagement is set out within the DtC Statement [SUB14a¹] which contains several signed Statements of Common Ground (SoCG), these are:
- Enfield and Affinity Water Ltd (July 2024)
 - Enfield and the Environment Agency (July 2024)
 - Enfield and Lee Vally Regional Park Authority (July 2024)
 - Joint LPA between Enfield and; Barnet, Broxbourne, Epping Forrester, Haringey, Hertsmere, Waltham Forest and Welwyn Hatfield (July 2024)²
 - Enfield and Natural England (July 2024)
 - Enfield and Network Rail (July 2024)
 - Enfield and NHS (July 2024)
 - Enfield and Sport England (July 2024)
 - Enfield and Transport for London (August 2024)
 - Enfield and Thames Water Utilities Ltd (July 2024)

¹ Sub14a replaced SUB14 which did not contain all signed SoCGs due to a copy and paste error.

² Welwyn Hatfield signed this SoCG on 15th August shortly after submission of the ELP. Signature obtained.

- Enfield and Historic England (August 2024)
- Enfield and National Highways (July 2024)

1.1.12 An updated SoCG was produced with Sport England [SUB14b], which set out an up-to-date position and clarification further to a question from the Inspector in [IN1] – paragraph 34.

1.1.13 To accompany this MIQ response, several updated or new SoCGs have been produced. This is in the interest of providing an updated position to the Inspector ahead of the Stage 1 hearings. These are:

- SUB14b – GLA SoCG – Signed (November 2024)
- SUB14c – National Highways SoCG – Signed (January 2025)
- SUB14d – Local Highway Authority –Signed (January 2025)
- SUB14e – London Borough of Enfield as Local Planning Authority and Landowner – Signed (November 2024)
- SUB14f - Meridian Water as Local Planning Authority and Promoter/Development- Signed (January 2025)
- SUB14g – Environment Agency – working draft – unsigned (January 2025)
- SUB14h – Natural England – Working draft unsigned (January 2025)

1.1.14 This effective engagement has continued beyond Regulation 19, through submission and beyond.

1.1.15 There is an intention to produce a number of additional SoCGs. These were broadly referred to in PQ22 [IN1]. Note that a number of these SoCGs are in relation to specific sites, and so are considered to be more helpful to inform Stage 2 of the hearings. Work on these is on-going.

1.1.16 In addition, there is a commitment to continue to keep the statements updated and will be updated as the examination progresses, where it is considered necessary.

1.1.17 The form of engagement has predominantly been through meetings letters or emails.

1.1.18 The Council considers that it has maximised the Plan's effectiveness by fostering robust and ongoing collaboration with neighbouring authorities and other prescribed bodies, ensuring that the above strategic planning matters have been comprehensively addressed throughout the plan-making process.

Q1.2. What outcomes have resulted from engagement and cooperation on relevant strategic matters and how have these informed the Plan's policies, including but not limited to: a) Housing b) Infrastructure c) Economy d) Heritage and culture e) Green infrastructure and the natural environment f) Flooding and drainage g) Transport.

Response:

1.2.1 The Council has actively and constructively engaged with neighbouring authorities and prescribed bodies on all relevant strategic matters, resulting in key outcomes that have directly shaped the policies in the Local Plan. These outcomes are detailed below:

a) Housing

1.2.2 The Council has collaborated extensively with the Greater London Authority and neighbouring authorities to identify housing needs and agree on strategies to address them. The London Strategic Housing Land Availability Assessment (SHLAA) provided the foundation for borough-level housing targets, while the Local Housing Needs Assessment (LHNA) [HNE1] offered locally specific evidence.

1.2.3 Engagement with neighbouring authorities on unmet housing needs was a key aspect of this collaboration. Enfield initiated discussions with its DtC authorities through both formal and informal mechanisms, including meetings, workshops, and written correspondence. These discussions sought to explore whether these authorities could accommodate any of Enfield's unmet housing needs, given regional constraints and shared housing pressures.

1.2.4 For example:

- In meetings with the London Borough of Waltham Forest and Epping Forest (January 2021), Enfield specifically raised the potential for cross-boundary housing provision and highlighted evidence of housing constraints within Enfield. While neighbouring boroughs recognised the challenge, they formally confirmed through responses that they were unable to assist due to their own capacity issues and local constraints, including green belt and infrastructure limitations.
- Joint discussions with the GLA and the North London Planning Group (December 2019 and August 2023) explored housing delivery strategies and the feasibility of accommodating unmet need within the wider region. These discussions were informed by shared evidence bases, including the SHLAA/HELAA [HOU1 – HOU10] and housing capacity studies.

1.2.5 Throughout these engagements, Enfield actively sought solutions to overcome challenges, such as exploring options for intensifying development within its own boundaries. These efforts are reflected in the Local Plan's strategy for optimising housing delivery on strategic sites such as Meridian Water and

Crews Hill. The Council also pursued innovative solutions for addressing housing need locally, including policies prioritising affordable housing and specialist housing for older people and vulnerable groups.

- 1.2.6 Evidence of the consultation process is documented in the Duty to Cooperate Statement and accompanying Statements of Common Ground (SoCGs) [SUB14a].

b) Infrastructure

- 1.2.7 Collaboration with infrastructure providers, such as National Highways (July and September 2019 and March 2020), Thames Water (August 2023) and local health providers such as the clinical Care Commission (CCC) (in June 2021, June 2023 and February 2024), has been integral to planning for essential highways, utilities, healthcare, education, and other community facilities. These engagements have informed the Infrastructure Delivery Plan (IDP) [IDP1] ensuring that infrastructure provision aligns (actively) with the borough's anticipated growth through the plan period and beyond.

- 1.2.8 During the plan-making process, the Council held regular discussions with key infrastructure partners to address strategic challenges and overcome potential barriers to delivery. For example:

- **National Highways:** Engagement focused on assessing the impact of growth on the strategic road network, particularly along the M25 and A10 corridors. Meetings explored mitigation measures to address anticipated increases in traffic and ensure alignment with National Highways' long-term infrastructure plans. Outcomes included agreements on infrastructure upgrades and capacity improvements, which are reflected in the IDP.
- **Thames Water:** Collaborative discussions with Thames Water identified critical infrastructure upgrades to support new housing and employment sites, including improvements to water supply and wastewater systems. For example, site-specific constraints were investigated for Crews Hill and Meridian Water, leading to agreed strategies for phased infrastructure delivery and the identification of funding mechanisms to avoid delays.
- **Local Health Providers and NHS:** Engagement with NHS partners addressed the need for expanded primary healthcare facilities to serve new developments. Through workshops and detailed capacity assessments, healthcare delivery strategies were aligned with anticipated population growth, ensuring that services are available in tandem with housing delivery.

- 1.2.9 These engagements were not limited to identifying issues but also actively sought to find solutions. For instance:

- With **Transport for London (TfL)**, discussions focused on strategic infrastructure projects, such as public transport connectivity and sustainable travel initiatives. Specific challenges, such as improving access to Crews Hill and Chase Park, were addressed through proposals for enhanced active

travel networks and bus services. These measures align with the Mayor's Transport Strategy and contribute to the Local Plan's objective of transitioning to low-carbon development.

- With **Education Providers**, meetings addressed school capacity constraints in areas of planned growth. Collaborative work led to the inclusion of new school provision in the IDP, ensuring sufficient educational facilities are available to support future communities.
- With **Utility Providers**, joint workshops tackled concerns about network capacity and funding. Thames Water and energy providers worked with the Council to agree on phased investment plans that align with development timelines, minimising risks of delayed infrastructure delivery.

1.2.10 The Council also engaged with multi-agency forums, such as the North London Waste Planning Group, to address cross-boundary infrastructure issues collaboratively. These discussions have informed robust policies within the Local Plan to ensure infrastructure delivery is both timely and responsive to the needs of new development.

Key Outcomes

1.2.11 The outcomes of these engagements demonstrate the Council's commitment to constructive and solution-focused collaboration:

- Alignment with the Mayor's Transport Strategy, facilitated by TfL discussions, has resulted in policies supporting sustainable travel and low-carbon infrastructure.
- Agreed strategies with National Highways and Thames Water have ensured critical infrastructure upgrades are planned and resourced, mitigating potential constraints on growth.
- Joint work with healthcare providers has ensured primary healthcare facilities are integrated into growth areas, such as Meridian Water, addressing population needs.

1.2.12 Through proactive and detailed engagement with infrastructure providers, the Council has overcome potential barriers and ensured that the Infrastructure Delivery Plan provides a robust framework to support the borough's planned growth. Evidence of this collaboration is detailed in the DtC Statement and accompanying SoCGs [SUB14a], which demonstrate the depth of investigation and resolution of strategic challenges.

c) Economy

1.2.13 The Council worked with the GLA, Local Enterprise Partnerships, and Functional Economic Market Area (FEMA) authorities to support economic development and manage industrial land. This collaboration has been instrumental in shaping policies that align with regional priorities and address local challenges, ensuring the borough's economic resilience and capacity to generate employment opportunities.

- 1.2.14 The Employment Land Review and FEMA Study provided key evidence to support the development of policies that promote the intensification of employment areas, particularly within Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSIS). These policies are designed to maximise the potential of industrial land, aligning with regional objectives and supporting Enfield's role as a key employment hub.
- 1.2.15 Policy E5 Transforming Industrial Sites promotes the intensification of industrial uses within SILs and LSISs through the efficient use of space, higher plot ratios, and the development of multi-storey schemes. The policy also encourages site assembly within designated employment areas to support more intensive formats of industrial activity, ensuring the borough meets its strategic economic needs.
- 1.2.16 Policy E6 Locally Significant Industrial Sites enhances the role of LSISs by safeguarding these areas for industrial-type activities while allowing flexibility for a broader range of uses, including non-ancillary office and residential uses, provided these proposals comply with other policies in the Local Plan. The policy adopts the Agent of Change principle, ensuring that new uses do not compromise existing industrial activities.
- 1.2.17 Through engagement with the GLA, FEMA authorities, and industrial stakeholders, the Council has strengthened the policies safeguarding the borough's SILs and LSISs. These areas are identified in the London Plan and on the Policies Map as critical to meeting Enfield's strategic economic needs and accommodating increases in employment floorspace.
- 1.2.18 This approach supports the transformation of industrial areas into dynamic employment zones capable of delivering high-quality jobs. It aligns with the borough's broader objectives to promote economic growth, enhance competitiveness, and ensure sustainable development. The integration of flexible policies for LSISs also reflects a balanced approach to modern industrial land use, meeting industrial needs while accommodating complementary activities that support the borough's overall economic strategy.
- 1.2.19 The Council's collaboration with regional partners has ensured that these policies are well-informed, reflecting both local priorities and regional objectives. This ongoing cooperation has enabled the Local Plan to respond effectively to the challenges of managing industrial land and fostering economic growth, ensuring that Enfield remains competitive within the London economy.

d) Heritage and Culture

- 1.2.20 Constructive engagement with Historic England has ensured the Local Plan incorporates a positive strategy for conserving and enhancing the borough's heritage assets. Early and detailed discussions focused on key themes, including the integration of Enfield's historic and cultural identity into urban

design, the protection of conservation areas, and the impact of new development, particularly tall buildings, on heritage assets and their settings.

1.2.21 The Council worked closely with Historic England throughout the preparation of the Local Plan. This collaboration informed key evidence base documents, including the Characterisation Study [DES42 and DES43] and Conservation Area Appraisals³, ensuring that policies are underpinned by a robust understanding of Enfield's heritage. For example, in discussions regarding Enfield Town, Historic England provided feedback on how regeneration proposals could align with conservation objectives, highlighting the need to sensitively manage public realm improvements while preserving the character of the historic core.

1.2.22 Through this engagement, specific challenges were addressed:

- **Impact of Tall Buildings:** Detailed discussions with Historic England focused on the potential impact of tall buildings on heritage assets and their settings. The Council collaborated with Historic England in January 2022 to refine policies requiring that proposals for tall buildings demonstrate how harm to the significance of heritage assets is minimised and mitigated. Where harm is unavoidable, these policies mandate clear and convincing justification, showing that alternatives have been explored and that public benefits outweigh any harm. This approach ensures a balance between protecting heritage and facilitating sustainable growth.
- **Conservation Area Management:** Collaborative efforts included updates to Conservation Area Appraisals to ensure they reflect both current conditions and future development pressures. Historic England's input was instrumental in ensuring these appraisals provide a robust framework for managing change while safeguarding heritage significance.
- **Integration of Heritage in Placemaking:** For regeneration areas such as Enfield Town, joint workshops explored how cultural and heritage assets could be celebrated and integrated into placemaking strategies. Historic England's advice informed policies that embed cultural considerations into urban design, supporting vibrant and historically sensitive regeneration.

1.2.23 The Council's engagement extended beyond formal meetings to include written responses, thematic workshops, and site-specific discussions. For instance, Historic England provided detailed comments on proposed policies (particularly Policies PL3, DE4 and DE6) and site allocations (such as SA8.1, SA8.4), ensuring that heritage considerations were fully embedded in the Local Plan. This collaborative approach also shaped policies addressing the reuse of historic buildings, promoting their sustainable adaptation for contemporary uses.

³ Conservation Areas can be viewed here: <https://www.enfield.gov.uk/services/planning/heritage/conservation-areas>

1.2.24 The Council has maintained an ongoing dialogue with the GLA regarding tall buildings. This includes detailed discussions about the Local Plan's Tall Buildings Policy, as highlighted in the updated SoCG signed on 29 November 2024 [SUB14b]. The SoCG acknowledges the borough's contextual and evidence-led approach, supported by documents such as the Character of Growth Report. While the GLA expressed concerns about specific aspects of the policy, such as height definitions and the application of the London Plan's principles, the Council has committed to continued collaboration to address these points and refine its approach further.

Key Outcomes

1.2.25 The outcomes of this engagement are reflected in policies that protect and enhance Enfield's heritage while enabling sustainable development. Specific achievements include:

- a) Strengthened policies (and associated maps) for tall buildings, requiring heritage impact assessments and clear justification for any harm caused to heritage assets.
- b) Integrated placemaking policies that celebrate the borough's cultural identity and promote heritage-led regeneration in areas such as Enfield Town.

1.2.26 Through its collaboration with Historic England, the Council has shown a strong commitment to balancing the preservation of Enfield's heritage with the need for sustainable growth and innovation. This evidence-based and iterative approach ensures that the Local Plan effectively protects the borough's historic environment while promoting a positive and forward-looking vision for its development.

1.2.27 The Local Plan's policies are a direct outcome of this extensive engagement, striking a careful balance between safeguarding Enfield's heritage and accommodating new development that complements and enhances the historic environment. By embedding these principles into the plan and maintaining active dialogue with key stakeholders, the Council reaffirms its dedication to protecting the borough's heritage while fostering sustainable and innovative urban growth.

e) Green Infrastructure and the Natural Environment

1.2.28 The Council has worked closely with Natural England, the Environment Agency, and other environmental bodies to protect and enhance Enfield's green infrastructure. The Recreational Mitigation Strategy for Epping Forest, developed in consultation with Natural England, addresses recreational pressures and air quality impacts on this Special Area of Conservation (SAC).

1.2.29 Policies also align with the Environment Act 2021, integrating Biodiversity Net Gain and Local Nature Recovery Networks into planning processes. Evidence such as the Green Infrastructure Strategy and assessments of Sites of

Importance for Nature Conservation (SINCs) underpins the Local Plan's approach to conserving natural habitats and biodiversity.

- 1.2.30 In parallel, Land Use Consultants (LUC) conducted an Appropriate Assessment to evaluate air quality impacts on the Epping Forest SAC, as detailed in Appropriate Assessment on Air Quality [E7.2] (October 2024). This study incorporated updated traffic modelling by WSP, which reduced the number of points exceeding air quality screening thresholds, reflecting revised assumptions about allocations at Crews Hill and Chase Park. The findings clarified that, while some localised exceedances exist, mitigation strategies will address these effectively. For instance, measures in collaboration with Epping Forest District Council, such as promoting Ultra-Low Emission Vehicles (ULEVs) and controlled parking zones, are expected to support compliance with conservation objectives.
- 1.2.31 The Council continues to work actively with environmental bodies to refine and enhance its strategies. An updated Statement of Common Ground with Natural England, which aligns with this ongoing work, further reinforces the Council's commitment to safeguarding biodiversity and green infrastructure as part of sustainable development. This collaborative approach ensures that the Local Plan supports environmental stewardship while accommodating future growth.

f) Transport

- 1.2.32 The Council has worked closely with TfL, National Highways, and Network Rail to address strategic transport issues. Engagement on projects such as Junction 24 of the M25, Crews Hill, and Chase Park has shaped policies promoting sustainable travel, public transport improvements, and active travel infrastructure.
- 1.2.33 Through regular meetings, workshops, and written correspondence, the Council and its partners have tackled complex transport challenges to ensure the borough's network can accommodate future growth. For example, discussions with National Highways addressed traffic impacts on Junction 24 of the M25, leading to the identification of necessary mitigation measures to support local and regional connectivity. Similarly, collaboration with TfL has informed policies promoting enhanced bus services, improved cycling and walking routes, and public transport access for key development sites.
- 1.2.34 The Local Plan has aligned with the Mayor's Transport Strategy and National Highways' objectives to facilitate a shift to low-carbon and active travel modes. Policies have been designed to support the Borough's transition to sustainable transport, ensuring that future growth demands are met in an environmentally responsible manner. For instance, the plan incorporates enhanced public transport connectivity for Crews Hill and Chase Park, supporting both local accessibility and broader sustainability goals.

- 1.2.35 Furthermore, the Council has benefited from its engagement with Network Rail on infrastructure improvements (from July 2021 to September 2023), ensuring that rail services support anticipated growth [SUB14, Appendix 1, and as set out in the Statement of Common Ground signed July 2024]. This includes discussions on station enhancements and improved service frequencies, particularly for areas experiencing significant residential and employment growth.
- 1.2.36 The Council's commitment to sustainable transport is further supported by ongoing work with key stakeholders. Work on a further SoCG with TfL is emerging and will be submitted shortly. As documented in appendices 1 and 2 to TfL's earlier Statement of Common Ground. These are set out within [E7.8]. These documents highlight shared priorities, including active travel infrastructure, and low-carbon transport initiatives, and reflects the Council's continued collaboration to refine its transport policies as the Local Plan progresses.
- 1.2.37 By fostering strong partnerships and incorporating best practices into its policies, the Council has ensured that the Borough's transport network is well-prepared to support future growth while prioritising environmental sustainability and accessibility.

Q1.3. Is the process of cooperation demonstrated with clear evidence, including SoCG as expected by NPPF paragraph 27 and the Planning Practice Guidance (PPG)? Do SoCG identify relevant strategic matters, actions in relation to cross boundary issues, and the outcomes of actions taken?

Response:

- 1.3.1 The DtC Statement [SUB14a] documents where effective cooperation has taken place. Strategic cross boundary matters addressed in the SoCGs have been discussed throughout the preparation of the Local Plan.
- 1.3.2 Paragraph 27 of the NPPF includes a requirement to produce Statements of Common Ground (SoCG) throughout the plan-making process to document where effective cooperation is (and is not) taking place as plans are drawn up and taken through the statutory process to adoption. The Council has engaged early and on an ongoing basis with other planning and highway authorities, and statutory bodies, in line with paragraph 27 of the NPPF. This is detailed within Q1.1 above.
- 1.3.3 As per paragraph 11 of the PPG (reference ID: 61-011-20190315) Enfield SoCGs contain written description and maps (where appropriate,) details of strategic matters being addressed, the responsibility of each party involved, governance arrangements with commitments to updating the statements, the status of other Local Plans, and distribution of need (where relevant), and a clear record of agreement and areas of disagreement. It is recognised that all

SoCGs were started using a standard template, but that these have evolved depending on the nature of issues raised.

1.3.4 Yes, the submitted Statements of Common Ground (SoCGs) identify relevant strategic matters, outline actions in relation to cross-boundary issues, and detail the outcomes of those actions. For example:

- **Collaboration with Hertfordshire County Council (HCC) and Welwyn Hatfield Borough Council (WH):** Discussions focused on transport and highway capacity concerns arising from development proposals near the borough boundary. HCC and WH initially raised concerns about potential impacts on strategic highways. To address these concerns, the Council commissioned additional transport modelling and incorporated mitigation measures into the Infrastructure Delivery Plan (IDP). The revised proposals include junction improvements and measures to support sustainable transport links. These actions are reflected in the updated SoCG, which documents both agreements and ongoing areas of concern.
- **The SoCG between the London Borough of Enfield (LBE) and National Highways [SUB14c]** outlines collaboration on traffic and infrastructure improvements, specifically addressing concerns around Junctions 24 and 25 of the M25. National Highways expressed concerns regarding potential congestion from proposed developments, and in response, the Council identified and tested mitigation schemes for these junctions, which were shared and discussed with National Highways to ensure alignment with both local and strategic transport priorities.
- **The SoCG with the Greater London Authority (GLA) [SUB14b]** highlights areas of both agreement and ongoing discussion, such as the borough's Tall Buildings policy and the proposed Green Belt releases at Crews Hill and Chase Park. While some aspects remain unresolved, the SoCG demonstrates the borough's proactive steps, including modifications to policies and evidence gathering, to address strategic concerns while aligning with regional objectives.
- **Engagement with Transport for London (TfL):** TfL's input on the Local Plan's transport policies has been instrumental in aligning development proposals with London-wide objectives. While a statement of common ground is forthcoming, agreement was reached on policies promoting active travel infrastructure, car-free or car-lite developments, and enhanced public transport services [E7.8].

1.3.5 While some areas of disagreement remain, for example, Welwyn Hatfield has expressed reservations about highway capacity impacts, the Council has provided assurances through detailed evidence, mitigation strategies, and a commitment to ongoing collaboration to monitor and address cross-boundary issues.

1.3.6 Additionally, it is important to highlight that many Duty to Co-operate bodies, including neighbouring boroughs and statutory consultees, have expressed broad agreement with the Council's overarching strategy. For example, bodies such as the Environment Agency and Natural England have supported the Council's approach to environmental protection and climate resilience, requiring no significant changes to the Plan's policies. Similarly, several London boroughs have indicated agreement with the Local Plan's alignment with strategic objectives set out in the London Plan.

1.3.7 The submitted SoCGs collectively demonstrate a robust and collaborative approach to meeting Duty to Co-operate requirements, ensuring that strategic cross-boundary matters are addressed effectively. The list of SoCGs provides further detail on the agreements reached and the actions taken to manage both agreements and disagreements with key stakeholders.

Q1.4. Are there any strategic matters, as defined by the legislation, which have not been specifically addressed through the DtC?

1.4.1 The Council considers that there are no other strategic matters which have not been adequately considered on a cross boundary basis. These strategic matters include housing, infrastructure, environment, economic development, and heritage and culture, all of which have been the subject of active and ongoing engagement with neighbouring authorities and prescribed bodies.

1.4.2 In relation to housing, the Council has worked closely with neighbouring authorities and the Greater London Authority (GLA) to address housing needs and cross-boundary issues related to unmet demand. Extensive discussions, supported by correspondence and formal Statements of Common Ground (SoCGs), have ensured that housing needs are appropriately addressed within the borough's capacity. The DtC Statement [SUB14a] and accompanying SoCGs provide clear evidence of this collaborative approach.

1.4.3 Infrastructure has also been a key focus, with strategic discussions held with Transport for London (TfL), National Highways, and other infrastructure providers. These engagements have informed policies on transport, utilities, healthcare, and education, as demonstrated in the Infrastructure Delivery Plan (IDP) and updated SoCGs. This proactive approach ensures that infrastructure provision aligns with the borough's growth trajectory while addressing cross-boundary impacts.

1.4.4 Environmental considerations have been addressed through collaboration with Natural England and the Environment Agency. These efforts have focused on managing recreational pressures on Epping Forest SAC, mitigating flood risks, and ensuring compliance with environmental legislation. Policies within the Local Plan reflect these cross-boundary engagements, ensuring that natural assets are protected and enhanced for future generations.

- 1.4.5 In the area of economic development, the Council has worked with Functional Economic Market Area (FEMA) authorities and the GLA to support employment land management and economic resilience. This includes safeguarding and intensifying Strategic Industrial Locations (SILs) to meet regional and local economic needs. The collaborative approach has ensured alignment between the borough's policies and regional economic priorities, as documented in the DtC Statement.
- 1.4.6 Finally, the Council has engaged with Historic England to address cross-boundary matters related to heritage. Input from Historic England has shaped policies that conserve and enhance shared heritage assets while supporting sustainable development.
- 1.4.7 The DtC Statement [SUB14a] provides detailed evidence of early, active, and ongoing engagement on these matters. Furthermore, any outstanding points raised by prescribed bodies or neighbouring authorities have been actively resolved or are being managed through continued dialogue and updates to SoCGs.
- Q1.5. Are there any outstanding concerns from adjoining authorities or other DtC bodies regarding the DtC itself, or the strategic matters identified? If so, how has the Council sought to address any issues raised?**

Response

- 1.5.1 There are no outstanding concerns from adjoining authorities or other DtC bodies regarding the DtC itself.
- 1.5.2 The areas of outstanding concerns from adjoining authorities or other DtC bodies regarding strategic matters are set out within [SUB14a – SUB14i]. It should be noted that the outstanding concerns are not about the identification of the strategic matters but about the approach to which the Council is taking to address them.
- 1.5.3 The Council acknowledges that while most strategic matters have been addressed through the DtC, some outstanding concerns remain, as raised by adjoining authorities and prescribed bodies, pertain to areas such as housing, Green Belt release, transport, industrial land, and environmental impacts. In response, the Council has undertaken active measures to address these concerns, proposing modifications to policies where appropriate and committing to continued collaboration to resolve any remaining issues.
- 1.5.4 The Greater London Authority (GLA) has raised several key issues during the DtC process. One significant area of concern relates to the release of Green Belt land at Crews Hill and Chase Park. The GLA does not support these releases, citing poor public transport accessibility and the potential for increased car dependency, which runs counter to the principles of sustainable development. The Council, however, has maintained that exceptional

circumstances justify the release of this land and has committed to further dialogue with the GLA to address their concerns, particularly through the refinement of transport strategies to mitigate accessibility issues.

- 1.5.5 Another issue raised by the GLA involves the treatment of tall buildings within the borough. The GLA has sought greater clarity on definitions of tall buildings, preferring a more nuanced approach that uses 'appropriate' height ranges' rather than 'maximum' heights for some site allocations. Additionally, the GLA has expressed concerns about exceptions for tall buildings outside designated areas in Policy DE6. The Council has proposed modifications to address these points, providing clearer definitions and retaining flexibility to allow for site-specific constraints. However, some areas of disagreement remain unresolved, and discussions are ongoing.
- 1.5.6 Housing policies have also been a point of discussion with the GLA, particularly regarding affordable housing thresholds and tenure splits. The GLA has emphasised that thresholds should not be treated as targets and has requested additional justification for the 50/50 tenure split in Policy H2. While the Council believes the existing evidence base is sufficient, it has indicated a willingness to provide further explanatory text to clarify its approach and address the GLA's concerns.
- 1.5.7 Concerns regarding industrial land have also been raised. The GLA has requested a more detailed breakdown of industrial and logistics space needs, including clarification in Table 9.1 of the Local Plan. They have also emphasised the importance of delivering industrial uses in mixed-use developments before residential occupation to ensure that employment priorities are safeguarded. Additionally, the GLA has suggested for whole-SIL (Strategic Industrial Location) masterplans rather than phased approaches. The Council has agreed to minor modifications to address these concerns and has indicated a willingness to continue discussions with the GLA to refine its approach to managing industrial land. An updated Statement of Common Ground with the GLA was signed on 29 November 2024 [SUB14b].
- 1.5.8 Transport-related issues have also been highlighted, particularly by both the GLA and Transport for London (TfL). The GLA and TfL have raised concerns about the sustainability of developments at Crews Hill and Chase Park, questioning whether these areas can support sustainable, non-car-dependent growth. TfL has emphasised the need for robust strategies to deliver public transport and active travel infrastructure and has requested that these elements be classified as 'essential' in the Infrastructure Delivery Plan (IDP). Additionally, TfL has raised concerns about the use of London Plan parking standards, advocating for stricter measures to reduce car dependency and align with Good Growth principles. The Council has committed to refining its transport strategy and addressing these points through ongoing collaboration with TfL, including reclassifying key infrastructure as essential and improving the clarity of policies related to parking standards and active travel. The outcome of these discussion

are set out in Appendices 1 and 2 to TfL's forthcoming Statement of Common Ground [E7.8].

- 1.5.9 Environmental concerns, particularly those raised by Natural England, have also been a significant focus of engagement. Natural England has raised concerns about air quality impacts on ecologically sensitive sites, such as Epping Forest Special Area of Conservation (SAC). They have highlighted potential exceedances of nitrogen and acid deposition thresholds and the cumulative impacts of the Local Plan in combination with other projects in the region. In response, the Council has undertaken additional air quality modelling and implemented mitigation measures, including reducing vehicle trips and enhancing public transport options. Natural England has ultimately agreed with the conclusions of the Shadow Appropriate Assessment on Air Quality [E7.2], confirming that the Local Plan sufficiently addresses these environmental impacts, and this will be reflected in an updated version of the Statement of Common Ground with Natural England [SUB14h].
- 1.5.10 The Council has also engaged with other prescribed bodies to address outstanding concerns. For example, the Environment Agency raised questions regarding the Sequential Test and Strategic Test for flood risk management. The Council has updated its Strategic Flood Risk Assessment (SFRA) [E7.5] and prepared a separate Sequential and Exceptions Test paper [E7.6], which have been agreed upon in principle by the Environment Agency, this will be reflected in an updated Statement of Common Ground with the Environment Agency [SUB14g]. Similarly, Sport England's initial concerns about the outdated Play Pitch Strategy (PPS) have been resolved through updates to the evidence base, as confirmed in an updated SoCG [SUB14B].
- 1.5.11 Historic England has raised concerns regarding the Character of Growth Study and the Local Plan's updates to evidence base documents. While the Council does not consider these modifications essential for soundness, it has indicated support for suggested changes if recommended by the Inspector.
- 1.5.12 While some outstanding concerns remain, the Council has actively engaged with adjoining authorities and prescribed bodies to address these issues comprehensively. Through modifications to policies, updates to evidence base documents, and commitments to ongoing dialogue, the Council has demonstrated its commitment to resolving concerns and ensuring that the Duty to Cooperate is met in full. These efforts reflect a constructive, iterative process that balances regional priorities with local needs, ensuring the soundness and effectiveness of the Local Plan.
- 1.5.13 TfL Spatial Planning has raised significant concerns regarding the transport infrastructure plans for Crews Hill (PL10) and Chase Park (PL11), specifically highlighting the lack of robust strategies to deliver sustainable modes of transport. Key issues include the perceived risk of car dependency due to the remoteness of these areas from existing public transport networks and the inadequacy of active travel connections. TfL has urged the Council to categorise

public transport infrastructure, such as enhanced bus routes and active travel improvements, as "essential" within the Infrastructure Delivery Plan (IDP), rather than "important" or "desirable." They also noted that indicative costs and funding strategies for this infrastructure remain unresolved.

- 1.5.14 TfL expressed further concerns about the IDP's September 2024 update, which they were not consulted on prior to its publication. This has led to apprehensions that the document does not accurately reflect the outcomes of previous discussions. TfL emphasised the need for the IDP to clearly categorise transport infrastructure as essential, while also including indicative costs, implementation timelines, and realistic funding mechanisms to ensure deliverability.
- 1.5.15 On parking standards, TfL questioned the Council's adherence to London Plan standards, advocating for stricter measures to align with Good Growth principles. Their concerns focus on the risk of undermining sustainable mode-share goals and public transport provision through the allowance of higher car parking ratios in areas like Crews Hill and Chase Park. TfL recommended revisiting car parking ratios to support aspirational targets for reducing car dependency.
- 1.5.16 The Strategic Transport Assessment (STA) [TRA1] has also been a point of contention. TfL argued that the STA relies on "worst-case" assumptions regarding car mode share in Green Belt areas, which they believe are inconsistent with the objectives of sustainable development. They proposed that updated modelling is necessary to reflect mode-share targets aligned with the London Plan, including inputs for car parking ratios, densities, and infrastructure improvements.
- 1.5.17 TfL has suggested that the development of Crews Hill and Chase Park should be facilitated through Area Action Plans (AAPs) rather than Supplementary Planning Documents (SPDs). They indicate that AAPs would allow for more comprehensive coordination and scrutiny, particularly given the fragmented land ownership in Crews Hill, which poses challenges to preventing piecemeal and unsustainable development.
- 1.5.18 Concerns were also raised about the alignment of current proposals with Good Growth principles, particularly regarding achieving higher densities and reducing reliance on private vehicles. TfL expressed reservations that the proposed strategies for Crews Hill and Chase Park do not fully reflect these principles.
- 1.5.19 In response, Enfield Council has committed to ongoing collaboration with TfL to refine transport strategies, update the IDP, and comprehensively address unresolved issues. Proposed modifications include clarifying plans for rail services, reclassifying key transport infrastructure as essential, and addressing TfL's feedback on parking standards and sustainable transport provision are proposed in Appendices 1 and 2 of TfL's forthcoming Statement of Common

Ground [E7.8]. These commitments reflect a shared objective to align development in Crews Hill and Chase Park with sustainable development and Good Growth principles.

- 1.5.20 The Council acknowledges an ongoing disagreement with Broxbourne Council regarding the accuracy of the transport modelling conducted by the Council as part of its Local Plan evidence base documents. Discussions are continuing to address these concerns, and a draft Statement of Common Ground (SoCG) between the two authorities is currently being developed. This document will aim to clarify the areas of disagreement and outline a pathway for resolving outstanding issues. The draft SoCG will be shared in due course as part of the collaborative efforts to ensure alignment and mutual understanding on cross-boundary transport matters.
- 1.5.21 Natural England raised significant concerns regarding the potential air quality impacts of Enfield's Local Plan on ecologically sensitive sites, particularly in the context of the Habitat Regulations Assessment (HRA). These concerns centred on the following key issues:
- 1.5.22 **Potential Air Quality Exceedances:** Natural England highlighted potential exceedances of nitrogen deposition and acid deposition thresholds at sensitive ecological receptors, including Special Areas of Conservation (SACs) such as Epping Forest. Initial air quality modelling identified exceedances of the 1% threshold for significant effects in several locations. This prompted a requirement for further investigation and effective mitigation measures to address these exceedances.
- 1.5.23 **In-Combination Effects:** Concerns were raised about the "in-combination" impacts of Enfield's proposed Local Plan when considered alongside other regional plans and projects. Natural England emphasised that these cumulative effects could exacerbate existing air quality issues, potentially undermining the conservation objectives of designated habitats.
- 1.5.24 **Appropriate Assessment and Mitigation:** Natural England required the Council to undertake a robust Appropriate Assessment as part of the HRA [SUB11] to determine whether the Local Plan would adversely affect the integrity of protected sites. A particular focus was placed on the adequacy of proposed mitigation measures, such as reducing vehicle trips and enhancing public transport, to address potential impacts.
- 1.5.25 **Clarification on Ecological Impacts:** Natural England sought detailed clarification on the ecological implications of the air quality modelling, including:
- The presence and sensitivity of qualifying habitats at locations where air quality thresholds were predicted to be exceeded.
 - Risks of acidification, including whether existing environmental conditions, such as clay bedrock, would naturally mitigate these risks.

- 1.5.26 **Air Quality Data and Methodology:** Natural England challenged earlier air quality assessments, asserting that they did not sufficiently reflect updated traffic and emissions data. Reassurances were sought to confirm that revised trip rates and updated vehicle emissions factors were integrated into the modelling process.
- 1.5.27 **Outcomes:** Through collaborative efforts, including updated air quality modelling, site-specific investigations, and the incorporation of robust mitigation measures, the Council addressed Natural England's concerns. The Shadow Appropriate Assessment on Air Quality [E7.2] ultimately concluded that the Local Plan's policies and proposed mitigation measures would sufficiently safeguard the integrity of designated habitats. Natural England agreed with these findings, confirming that no outstanding issues remained.
- 1.5.28 An updated Statement of Common Ground (SoCG) has been prepared and is attached [Sub14.h]. While it remains unsigned, all issues have been resolved to Natural England's satisfaction.
- 1.5.29 The Environment Agency raised concerns regarding aspects of the Sequential Test and the Strategic Flood Risk Assessments (SFRA) Level 1 [FLD4-5] and Level 2 [FLD6-14], particularly in relation to their conclusions. To address these concerns, the Council updated the SFRA [E7.5] and produced a separate Sequential and Exceptions Test paper [E7.6]. Both documents were reviewed and agreed upon by the Environment Agency, ensuring that the flood risk assessments align with national policy and provide robust evidence for the Local Plan.
- 1.5.30 The updated Statement of Common Ground (SoCG) with the Environment Agency reflects these resolutions and is attached [Sub14g]. While the SoCG remains unsigned, there are no outstanding issues, and the Environment Agency has confirmed agreement with the updated evidence base.
- 1.5.31 Sport England initially raised concerns regarding the use of an outdated Playing Pitch Strategy (PPS) and the absence of a built sports facilities study within the evidence base. In response, the Council engaged with Sport England to address these issues comprehensively.
- 1.5.32 The updated Statement of Common Ground (SoCG) [SUB14b] reflects the progress made, confirming that these concerns have been resolved and there are no outstanding issues. Sport England is satisfied that the Council's approach appropriately considers the needs for sports and recreational facilities in the borough.
- 1.5.33 Historic England raised concerns about aspects of the Character of Growth Study [DES1-43] and related elements of the evidence base, particularly regarding their application in shaping policies and site allocations. In response, the Council has proposed modifications to address these concerns and enhance clarity and alignment with national guidance.

- 1.5.34 While the Council maintains that these modifications are not necessary to ensure the soundness of the Local Plan, it is prepared to support them if recommended by the Inspector, demonstrating a collaborative and proactive approach to addressing Historic England's feedback.
- 1.5.35 National Highways expressed satisfaction with the approach taken by the Council in addressing strategic road network concerns during the preparation of the ELP. Key areas of agreement include collaboration on transport capacity assessments and mitigation strategies for the M25 Junction 24, where marginal delays were identified through detailed modelling. The Council proposed a mitigation scheme, which was discussed with both National Highways and Hertfordshire County Council and incorporated into the Infrastructure Delivery Plan (IDP) [IDP1-2].
- 1.5.36 The signed Statement of Common Ground (SoCG) [SUB14c] confirms that all issues have been resolved, and no outstanding matters remain. Both parties agree to ongoing collaboration on strategic matters and evidence base studies as the Local Plan progresses. The mitigation scheme and the commitment to sustainable travel and demand management approaches for Crews Hill and Chase Park demonstrate the Council's proactive strategy to address transport challenges while supporting development. This signed SoCG reflects the constructive working relationship and mutual commitment to resolving strategic transport issues effectively. No further concerns have been raised by National Highways.
- 1.5.37 The Statement of Common Ground (SoCG) with the Joint Local Highway Authorities, involving Hertfordshire County Council, Essex County Council, and the London Boroughs of Barnet, Waltham Forest, and Haringey, has been agreed upon in principle but remains unsigned as of the December 2024 draft [SUB14d].
- 1.5.38 This SoCG reflects the parties' commitment to addressing cross-boundary transport issues arising from the Enfield Local Plan, with a shared focus on promoting sustainable travel, managing network demand, and identifying necessary mitigation measures. Key areas of agreement include:
- **Sustainable Travel:** Joint support for policies that encourage sustainable and active travel modes, particularly in growth areas like Crews Hill and Chase Park.
 - **Cross-Boundary Infrastructure:** Coordination on active travel links and public transport enhancements to reduce car dependency and improve connectivity across borough boundaries.
 - **Upper Lee Valley and New Southgate:** Collaboration with relevant authorities to integrate infrastructure requirements into respective delivery plans for these opportunity areas.

- **Mitigation Measures:** Agreement to monitor and address transport capacity concerns, such as those at M25 Junction 24, with collaborative approaches to develop improvement schemes.

1.5.39 While the document is yet to be formally signed, no outstanding concerns or disagreements have been identified, and the Council remains committed to finalising the agreement. This SoCG demonstrates the Council's compliance with the Duty to Cooperate, ensuring that transport strategies align with the Local Plan's objectives and address the needs of all affected stakeholders.

Q1.6. In overall terms, is there evidence to demonstrate that, during the preparation of the Plan, the Council has engaged constructively, actively and on an on-going basis with relevant authorities and prescribed bodies on relevant strategic matters? Has the Duty to Cooperate been met in a manner consistent with paragraphs 24 - 27 of the NPPF?

Response

- 1.6.1 The Council considers that there is clear evidence to demonstrate that, during the preparation of the ELP, it has engaged constructively, actively, and on an ongoing basis with relevant authorities and prescribed bodies on all relevant strategic matters. As evidenced in the responses to Q1.1–Q1.5, this engagement has been thorough and in compliance with the Duty to Cooperate (DtC), as set out in paragraphs 24–27 of the National Planning Policy Framework (NPPF).
- 1.6.2 Engagement has been multi-faceted, involving formal meetings, written correspondence, workshops, and collaborative evidence preparation. Key strategic matters addressed through the DtC include housing, transport, green infrastructure, flood risk, economic development, and heritage. The Council has documented these efforts in the DtC Statement [SUB14a] and accompanying Statements of Common Ground (SoCGs), which demonstrate extensive and effective collaboration with prescribed bodies such as the GLA, TfL, Natural England, Historic England, National Highways, and neighbouring authorities.
- 1.6.3 The Council's engagement began at the Regulation 18 stage, where discussions focused on identifying housing and infrastructure needs, transport challenges, and environmental considerations. For example:
- **Housing Need:** In January 2021, meetings with Waltham Forest and Epping Forest councils explored options for accommodating unmet housing need. Both authorities confirmed they were unable to accommodate Enfield's unmet need due to capacity constraints, leading to a focus on intensifying development within Enfield's boundaries.
 - **Strategic Transport:** Early collaboration with TfL identified transport infrastructure needs for Meridian Water, resulting in enhanced public

transport proposals such as additional rail capacity and improved cycling infrastructure to support housing delivery in this area.

1.6.4 Collaboration with infrastructure providers has ensured that the Infrastructure Delivery Plan (IDP) addresses critical challenges:

- **National Highways:** Discussions on the impact of growth on Junction 24 of the M25 led to agreed mitigation measures, including signal upgrades and capacity enhancements, as documented in the signed SoCG [SUB14c].
- **Thames Water:** Site-specific constraints at Crews Hill were addressed through joint discussions, resulting in phased delivery plans for water and wastewater infrastructure, which are reflected in the IDP.

1.6.5 Statements of Common Ground (SoCGs) have formalised these collaborative efforts:

- **Natural England:** Concerns about air quality impacts on the Epping Forest Special Area of Conservation (SAC) were addressed through additional air quality modelling and mitigation strategies, such as promoting Ultra-Low Emission Vehicles (ULEVs) and controlled parking zones. The updated Shadow Appropriate Assessment [E7.2] ultimately concluded that these measures sufficiently safeguarded the SAC.
- **TfL:** TfL raised concerns about parking standards and public transport access for Crews Hill and Chase Park. In response, the Council committed to reclassifying key transport infrastructure as "essential" and proposed further policy modifications to align with Good Growth principles, as detailed in Appendices 1 and 2 of the updated TfL SoCG [E7.8].

1.6.6 Examples of collaborative outcomes include:

- **Employment Land:** Engagement with Functional Economic Market Area (FEMA) authorities led to policies promoting industrial intensification in Strategic Industrial Locations (SILs), such as Edmonton Leaside. This collaborative effort ensured alignment with regional economic strategies and maximised employment land efficiency. For example, the Employment Land Review (ELR) [EMP1] and FEMA Study [EMP5] provide a robust evidence base demonstrating the Council's strategic planning for industrial intensification. The ELR assessed existing and potential employment sites in Enfield, identifying opportunities for intensification and modernisation to align with regional economic objectives. The FEMA study ensured that these strategies were integrated with broader economic plans for the North London sub-region. The signed SoCG with the Greater London Authority (GLA) [SUB14b] highlights agreement on safeguarding and intensifying SILs to meet regional and local economic needs. Specific references are made to Edmonton Leaside as a key area for industrial transformation. Collaboration with FEMA authorities, including Hertfordshire, Broxbourne, and Essex

Councils, ensured that cross-boundary economic implications were addressed comprehensively. These discussions are documented in the joint SoCGs with these authorities [SUB14d]. Policy E5 in the ELP explicitly promotes the intensification of SILs through higher plot ratios, multi-storey schemes, and site assembly. It is informed by engagement with the GLA and FEMA authorities to ensure that Enfield's industrial land strategies contribute to regional economic resilience and competitiveness. The IDP outlines the infrastructure requirements to support industrial intensification in SILs like Edmonton Leaside, including transport and utilities upgrades. These plans were informed by collaborative discussions with National Highways, Thames Water, and other infrastructure providers, ensuring the feasibility of intensified industrial uses. These pieces of evidence collectively demonstrate that the Council's engagement with FEMA authorities and other stakeholders has directly shaped the policies and strategies for employment land in Enfield, aligning them with both local needs and regional objectives.

- **Flood Risk Management:** The SFRA Level 1 and Level 2 Reports [FLD4-5 and FLD6-14] were updated following detailed discussions with the Environment Agency to incorporate the latest flood modelling and data, including assessments of surface water, groundwater, and fluvial flood risks. These updates specifically addressed areas of concern such as Crews Hill and other strategic development sites. The Level 2 SFRA assessed site-specific risks and mitigation measures, ensuring that flood risks were appropriately managed without compromising the safety and viability of proposed developments. The Sequential and Exceptions Test Paper [E7.6] was produced in line with the updated SFRA and the NPPF's requirements. It systematically evaluated the suitability of proposed development sites, prioritising those at lower flood risk while applying robust justification for development in higher-risk areas where necessary. For Crews Hill, the Sequential Test demonstrated that the site's development could proceed with appropriate mitigation measures, as outlined in the SFRA and site-specific flood risk assessments. Regular discussions and workshops with the Environment Agency ensured alignment on flood risk management strategies. For example, meetings held in March 2023 and July 2024 focused on refining the SFRA and ensuring compliance with national planning policies. The Environment Agency provided formal feedback on the revised SFRA and Sequential Test, confirming that they addressed previously raised concerns and aligned with best practices in flood risk management. The draft SoCG with the Environment Agency [SUB14g], while unsigned, documents agreement in principle on the Council's approach to flood risk management. It acknowledges the robustness of the updated SFRA and Sequential Test and highlights the collaborative efforts undertaken to address flood risks comprehensively. The IDP incorporates critical infrastructure requirements identified in the updated SFRA, such as sustainable drainage systems (SuDS) and flood mitigation measures for strategic sites, including Crews Hill. This ensures that infrastructure planning is directly informed by flood risk considerations. For Crews Hill, the updated

SFRA identified specific flood mitigation measures, including enhanced surface water drainage systems, flood storage areas, and green infrastructure to manage runoff. These measures have been integrated into the development framework for the site to ensure resilience against flooding. These pieces of evidence demonstrate that the Council's proactive and collaborative approach to flood risk management has resulted in a robust evidence base and policy framework, addressing the Environment Agency's concerns and ensuring that strategic development sites like Crews Hill can proceed safely and sustainably.

1.6.7 While some outstanding concerns remain, such as TfL's request for stricter parking standards and the GLA's concerns about Green Belt releases, the Council continues to engage actively with stakeholders to resolve these issues. For instance:

- Ongoing discussions with TfL have focused on refining the transport strategy for Crews Hill, with a commitment to explore additional bus routes and active travel connections to reduce car dependency.
- Collaboration with the GLA has emphasised the exceptional circumstances justifying Green Belt releases and the integration of sustainable development principles in these areas.

1.6.8 The Council's collaborative approach has ensured that the ELP is robust, evidence-based, and aligned with national and regional priorities. The constructive engagement with relevant authorities and prescribed bodies has maximized the plan's effectiveness and demonstrated compliance with the NPPF's requirements for the DtC.

1.6.9 In conclusion, the Council believes it has fully discharged its Duty to Cooperate by fostering meaningful and ongoing collaboration with all relevant stakeholders. Evidence of this is comprehensively documented in the DtC Statement [SUB14a] and the extensive suite of SoCGs, which collectively demonstrate a proactive and solution-oriented approach to addressing strategic matters. Where issues remain outstanding, the Council continues to work with stakeholders to resolve them as the examination progresses.

Issue 1.2: General Conformity with the London Plan

Q1.7. In overall terms, is the Plan in general conformity with the London Plan?

Response

- 1.7.1 Yes, the Council considers that the Enfield Local Plan (ELP) is in general conformity with the London Plan, as set out in the Conformity Topic Paper [E3.2].
- 1.7.2 The Council has worked closely with the Greater London Authority (GLA) throughout the plan-making process to ensure alignment with the strategic priorities of the London Plan. The ELP reflects the London Plan's objectives for sustainable growth, housing delivery, infrastructure provision, environmental protections, and the optimisation of land use. In summary, the GLA has raised two ongoing conformity concerns, with further detail provided to our response to Q1.8: the first relating to tall buildings, the second relating to the release of land in the Green Belt.
- 1.7.3 On tall buildings, the GLA has raised concerns about the Council's proposed modifications to Policy DE6(5), specifically regarding the inclusion of 'typography' and the clause related to civic buildings. The Council believes that the proposed modifications align with the London Plan by ensuring a design-led approach to managing tall buildings (London Plan Policy D9). The inclusion of 'typography' ensures that tall building proposals respond appropriately to the character, scale, and landscape of the Borough, particularly in areas of historic or environmental sensitivity. While the GLA has suggested deleting DE6(5), the Council maintains that these provisions do not undermine general conformity with the London Plan and will ensure robust development management outcomes. Any remaining concerns can be addressed during the examination.
- 1.7.4 On Green Belt and Exceptional Circumstances, the GLA disagrees with the Council's justification of Exceptional Circumstances for the release of Green Belt land to meet identified housing and employment needs. However, this is not a conformity question but a question of judgement as to whether the necessary justification for Green Belt release has been shown such that the ELP is sound (see paragraph 29 of the Conformity Topic Paper [E3.2]). The exceptional circumstances have been demonstrated, as outlined in the Exceptional Circumstances Topic Paper [TOP5], and this approach aligns with the London Plan's emphasis on balancing growth with the protection of Green Belt (London Plan Policy G2). The ELP also prioritises the optimisation of previously developed land and urban intensification before considering Green Belt release, consistent with the London Plan.
- 1.7.5 Further details on these issues and the Council's position are set out in our response to Q1.8.

Q1.8. What, if any, modifications have been proposed to address any issues of general conformity? What is the current position of the Mayor of London in light of these suggested modifications?

Response

1.8.1 The Borough has proposed several modifications to address issues raised by the GLA, as outlined in the updated Statement of Common Ground (29 November 2024) [SUB14b]. These modifications respond to key concerns regarding Tall Buildings, Employment Policies, and the Monitoring Framework.

Tall Buildings (Policy DE6):

1.8.2 Two specific modifications were introduced to address the GLA's concerns:

- a) Removing part 6 of Policy DE6, which references exceptions for tall buildings outside designated areas.
- b) Amending part 4 of Policy DE6 to clarify that proposals for heights above identified thresholds must justify compliance with other development plan policies or material considerations.

1.8.3 Despite these modifications, the GLA maintains objections concerning the inclusion of 'topography' and 'civic buildings' in part 5 of Policy DE6, believing this deviates from the London Plan Policy D9. However, the Borough considers these elements help to ensure the policy reflects Enfield's local context, such as areas where topography mitigates perceived building heights. The GLA and LBE acknowledge this matter as unresolved, pending examination.

1.8.4 The Borough considers these elements to be important to ensure that Policy DE6 reflects Enfield's unique local context and addresses site-specific considerations in a way that is consistent with the London Plan's overarching principles. The Conformity Paper [E3.2] highlights the following key points to support this stance:

a) Design-Led Approach (Aligned with D9):

- Policy DE6 has been developed with a focus on delivering tall buildings in appropriate locations, ensuring alignment with the London Plan's emphasis on a design-led approach. By considering factors like topography, the policy allows for context-sensitive responses, such as mitigating visual impacts of tall buildings in hilly areas or where the natural landscape reduces perceived building heights.

b) Local Context (Paragraphs 4.1.9 to 4.1.12 of E3.2):

- The Borough's approach reflects the London Plan's acknowledgment that local plans must consider borough-specific contexts and challenges. The use of 'topography' and 'civic buildings' enables Enfield to account for

unique local conditions, such as historic or civic character, while adhering to the strategic intent of the London Plan.

c) Precedent for Flexibility:

- As noted in the Conformity Paper [E3.2], Policy DE6 is consistent with the intent of London Plan Policy D9 Part A, which provides flexibility for boroughs to establish bespoke definitions and approaches to tall buildings. The inclusion of topography aligns with this principle, ensuring that development is appropriate to Enfield's urban character.

d) Safeguarding Strategic Objectives:

- The Borough's approach safeguards the London Plan's overarching goals of promoting good growth, optimising land use, and delivering high-quality design. Civic buildings are included to recognise their importance as landmarks or focal points within the urban fabric, where prominence may be justified.

1.8.5 While the GLA maintains its objection, both parties acknowledge that this matter remains unresolved and is best addressed during the examination. The Borough believes its proposed modifications strike a balance between meeting the strategic requirements of the London Plan and addressing local planning considerations.

Employment Policies and Monitoring Framework (Policies E1 & Monitoring Indicator 12)

1.8.6 The Council has undertaken significant modifications to align with the Greater London Authority's (GLA) "plan, monitor, manage" approach, which aims to ensure industrial and logistics needs are effectively addressed. These changes include:

- a) **Updated floorspace quantum:** The modifications now distinguish between requirements for B2/B8 uses and Core Industrial activities, reflecting the diverse needs of Enfield's employment landscape. This refinement is set out in the Employment Land Review and Topic Papers [EMP1 and TOP4], which provide evidence of the borough's industrial land demands and constraints.
- b) **Table 9.1 revisions:** To provide greater clarity, this table now explicitly identifies site designations, such as Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), along with their respective floorspace contributions. This adjustment addresses previous ambiguity and ensures stakeholders understand the strategic importance of each site.
- c) **Enhanced monitoring targets:** The inclusion of specific metrics in Monitoring Indicator 12 ensures progress on industrial and logistics needs

can be effectively tracked. This enhancement aligns with the GLA's monitoring framework and strengthens accountability for policy outcomes.

- 1.8.7 The GLA acknowledges these changes as addressing its recommendations for clarity and alignment with regional strategies. While the GLA considers these modifications to primarily address advisory matters rather than strict issues of general conformity, it recognises the improvements as outlined in the Statement of Common Ground, signed on 29 November 2024 [SUB14b].
- 1.8.8 These amendments demonstrate the Borough's commitment to refining its employment policies, supported by robust evidence and collaborative engagement with key stakeholders, ensuring alignment with both local needs and broader regional objectives.

Exceptional Circumstances for Green Belt Release:

- 1.8.9 No modifications have been proposed to the exceptional circumstances justification, as the Borough considers the evidence robust and the allocations sound. The Exceptional Circumstances Topic Paper [TOP5] demonstrates the Borough's compliance with London Plan Policy G2, ensuring that the release of Green Belt is justified to meet housing and employment needs.
- 1.8.10 The GLA disagrees with the Borough's approach to Green Belt release, particularly at Crews Hill and Chase Park, citing poor public transport accessibility and concerns over car dependency. However, this is essentially a question of soundness. If the Inspector is satisfied that exceptional circumstances are demonstrated then it would follow that there is compliance with the London Plan, which contains the same test as national policy. See further paragraph 29 of the Conformity Paper [E3.2].
- 1.8.11 Overall, the Borough has made targeted modifications to address the GLA's concerns where feasible and aligned with the strategic objectives of the London Plan. While some objections remain unresolved, specifically around Tall Buildings and Green Belt release, the Borough considers these matters either do not go to the general conformity of the ELP with the London Plan or can be addressed during the examination process.
- 1.8.12 Further detail on the modifications and unresolved matters is provided in the response in the updated SoCG and accompanying Topic Papers.

Q1.9. Are any further discussions with the Mayor of London taking place, when is it expected those discussions would be concluded and what is the intended outcome?

Response

- 1.9.1 The Council has actively engaged with GLA officers on key areas, including industrial policies, tall buildings, housing targets, and transport infrastructure. The GLA has indicated that discussions should primarily focus on industrial policies, where significant progress has been made.
- 1.9.2 Discussions on industrial policies have culminated in the updated Statement of Common Ground (SoCG) (dated 29 November 2024) [SUB14b]. This document outlines agreed amendments to clarify site designations, address industrial land use quantum, and align with the GLA's monitoring framework. These updates primarily involve minor modifications, as they address advisory points rather than strict matters of general conformity. The Borough does not anticipate further discussions on industrial policies unless these arise during examination hearings.
- 1.9.3 In contrast, issues related to tall buildings remain unresolved. Specific areas of contention include the treatment of 'topography' and 'civic buildings' in Policy DE6. The Borough has requested further engagement to refine these elements and ensure alignment with both local character and GLA expectations. Discussions are ongoing, and this matter is likely to feature during the hearings.
- 1.9.4 With respect to transport, collaboration with TfL has focused on the Local Plan's transport infrastructure and delivery mechanisms. Notably:
- TfL has raised concerns about sustainable transport access to key placemaking areas such as Crews Hill and Chase Park. While the Borough has included infrastructure proposals in the Infrastructure Delivery Plan (IDP) (updated 30 September 2024), TfL has requested further updates to reflect agreed priorities, including active travel infrastructure, bus routes, and funding mechanisms.
 - The Borough has proposed specific modifications to site allocation policies to align with TfL recommendations for car-free or car-lite developments and enhancements to public transport infrastructure.
- 1.9.5 Appendices 1 and 2 to TfL's forthcoming Statement of Common Ground (January 2025) [E7.8] highlight outstanding concerns about parking standards, bus service enhancements, and active travel linkages. While these issues are not deemed to impede legal compliance or soundness, they remain under discussion to ensure the Local Plan's alignment with Good Growth principles and London Plan objectives.
- 1.9.6 The Council acknowledges that some changes arising from discussions with TfL and the GLA may require Modifications to the ELP. These modifications will be

identified and confirmed through ongoing dialogue and examination hearings, ensuring that they address matters of legal compliance and soundness as required under the Planning and Compulsory Purchase Act 2004.

- 1.9.7 As of now, no further formal meetings with the GLA have been scheduled. The Council has reached out to TfL requesting for a meeting. The Council remains open to continued dialogue, particularly on unresolved matters relating to tall buildings, housing targets, and transport infrastructure. The Council is committed to refining the IDP and site-specific policies to address TfL's recommendations and ensure the delivery of sustainable, well-planned growth.
- 1.9.8 In conclusion, the Council has made significant progress in addressing strategic matters with the Mayor of London and TfL through sustained dialogue and the preparation of updated SoCGs. While industrial policies have been effectively resolved, and modifications proposed for transport and parking standards demonstrate alignment with regional objectives, certain areas, such as tall buildings and transport infrastructure in placemaking areas, remain under active discussion. These discussions are expected to continue leading up to and during the examination hearings, with the aim of refining the Local Plan's policies to address outstanding concerns. The Borough remains committed to ensuring that any necessary modifications, whether advisory or legally required, are made in a timely manner to achieve general conformity with the London Plan, meet the requirements of the NPPF, and support the soundness and effectiveness of the Local Plan.

Q1.10. Are any main modifications proposed to address issues of general conformity?

Response

- 1.10.1 The Council has carefully reviewed the Enfield Local Plan (ELP) in relation to its general conformity with the London Plan. The modifications outlined below address specific concerns raised by the GLA, such as refinements to industrial policies, transport standards, and the treatment of tall buildings. While these changes enhance clarity and alignment with strategic objectives, they are primarily advisory in nature and do not alter the ELP's legal compliance.

Industrial Policies:

- **Updated Floorspace Quantums:** The Council has clarified the requirements for B2/B8 uses and Core Industrial activities, as set out in the Employment Land Review [EMP1] and the Conformity Paper [E3.2]. These updates ensure the ELP reflects regional industrial needs and addresses the GLA's concerns about clarity in policy application.
- **Revisions to Table 9.1:** Modifications to Table 9.1 explicitly identify Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs) and their respective floorspace contributions, as detailed in [E3.2].

This adjustment resolves ambiguity and provides stakeholders with clear information about the strategic importance of these sites.

- **Enhanced Monitoring Framework:** Monitoring Indicator 12 now includes specific metrics to track delivery against industrial and logistics needs, consistent with the "plan, monitor, manage" approach advocated by the GLA. This aligns the monitoring framework with London Plan expectations for employment land delivery and ensures accountability for policy outcomes.

Transport Standards:

- **Infrastructure Categorisation:** In response to TfL's feedback, transport infrastructure in the Infrastructure Delivery Plan (IDP) [IDP1] has been reclassified as "essential" for placemaking areas such as Crews Hill and Chase Park. This ensures prioritisation of sustainable transport access and alignment with Good Growth principles.
- **Parking Standards:** Modifications to site allocation policies reflect a balance between minimising car dependency and addressing the practical challenges of outer London locations. These refinements ensure parking provisions are consistent with the London Plan while accommodating Enfield's unique spatial and transport context, as outlined in [E3.2, Section 6.4].

Tall Buildings (Policy DE6):

- **Removal of Part 6:** The deletion of Part 6, which allowed exceptions for tall buildings outside designated areas, addresses GLA concerns about deviations from the design-led principles of London Plan Policy D9.
- **Amendments to Part 4:** Proposals for tall buildings exceeding identified thresholds must now demonstrate compliance with other development plan policies or material considerations, ensuring robust decision-making processes.
- **Clarifications in Part 5:** While the GLA has raised concerns about the inclusion of 'topography' and 'civic buildings,' the Council has maintained these elements to reflect Enfield's unique local context. These provisions ensure that tall buildings integrate sensitively with their surroundings, addressing site-specific considerations such as historic and civic character, as supported in [E3.2, Section 4.1].

1.10.2 These modifications respond to advisory feedback and aim to enhance the clarity and robustness of the Plan. They do not, however, represent fundamental changes required to achieve general conformity with the London Plan. The Conformity Paper [E3.2] confirms that the ELP aligns with the strategic intent of the London Plan across all key policy areas, including housing, employment, transport, and environmental protection.

- 1.10.3 The Council acknowledges that further refinements may emerge during the examination hearings, particularly in response to discussions on Green Belt release, tall buildings, and transport infrastructure. These refinements will focus on ensuring soundness and enhancing alignment with regional objectives rather than addressing any deficiencies in legal compliance.
- 1.10.4 The modifications demonstrate the Council's proactive engagement with the GLA and TfL to address outstanding concerns while preserving the ELP's integrity and alignment with local priorities. For example:
- **Exceptional Circumstances for Green Belt Release:** The Borough has maintained a robust justification for Green Belt release at Crews Hill and Chase Park, supported by the Exceptional Circumstances Topic Paper [TOP5]. While the GLA has raised concerns about public transport accessibility and car dependency, the Council has demonstrated compliance with the London Plan's emphasis on balancing growth and Green Belt protection (Policy G2).
 - **Optimisation of Land Use:** Policies have been designed to reflect the London Plan's objectives for optimising previously developed land and supporting sustainable growth, as highlighted in [E3.2, Section 3.2].
- 1.10.5 In conclusion, the ELP remains in general conformity with the London Plan, and the modifications proposed serve to clarify and strengthen policy application without introducing fundamental changes. The Council is committed to addressing any additional feedback through the examination process, ensuring the Plan meets both local and regional objectives and supports sustainable, inclusive growth.

Q1.11. Is it clear how the individual policies of the Plan relate to those of the London Plan? Is there any duplication between the policies of the Plan and the London Plan? If so, does this impact on the effectiveness of the development plan as a whole?

Response

- 1.11.1 The Enfield Local Plan (ELP) has been developed to complement and conform with the London Plan while reflecting the specific needs and characteristics of the Borough. A schedule [E3.3] has been prepared in response to the Inspector's Preliminary Matters and Questions PQ6 to set out the relationship between the ELP policies and the relevant London Plan policies, ensuring clarity and alignment.
- 1.11.2 The ELP provides a clear relationship between its policies and the London Plan by aligning key objectives, including housing, design, sustainability, and transport. Policies within the ELP are locally nuanced to respond to the unique challenges and opportunities in Enfield, such as urban-rural integration and localised character areas. For example, the relationship between ELP Policy

SS1 (Spatial Strategy) and London Plan policies such as GG2 (Making Best Use of Land) and H1 (Increasing Housing Supply) illustrates how local policies are informed by and build upon strategic London-wide objectives.

- 1.11.3 While some duplication exists between ELP and London Plan policies, this is intentional. The duplication ensures the ELP can be read as a stand-alone document, reducing the need for frequent cross-referencing to the London Plan. This approach improves usability, particularly for applicants, decision-makers, and other stakeholders navigating the development process.
- 1.11.4 Duplication also enhances the ELP's effectiveness by contextualising London Plan policies to meet local needs. For example, Policy DE14 (External Amenity Standards) builds upon London Plan Policy D6, providing specific requirements tailored to Enfield's housing typologies and context. These minor nuances ensure that policies remain consistent but also locally effective.
- 1.11.5 The ELP is designed to function cohesively with the London Plan as part of the development plan. The minor duplication identified does not conflict with London Plan policies nor compromise the effectiveness of the plan as a whole.
- 1.11.6 Duplication is limited to areas where local adaptation is necessary, such as Enfield's distinct spatial strategy, design principles, and approach to housing. This enhances the overall coherence and delivery of development objectives.
- 1.11.7 An audit of sample policies has demonstrated that duplication serves a constructive purpose, making policies easier to apply and interpret without detracting from their conformity with the London Plan. The Borough acknowledges that further efficiencies in wording could be considered during future plan-making stages but maintains that the ELP, as submitted, is effective and legally compliant.
- 1.11.8 The ELP is clear in how its policies relate to the London Plan, and any duplication is deliberate and does not undermine the effectiveness of the development plan. Instead, it enhances the accessibility and usability of the ELP, ensuring it serves as a practical tool for delivering sustainable growth in Enfield.

Issue 1.3: Public Engagement

Q1.12. Has the Plan been prepared in accordance with the statutory requirements of the Planning and Compulsory Purchase Act 2004 and the associated Regulations, including in respect of the publication and availability of documents, advertisements and notifications?

Overview

- 1.12.1 During the Regulation 19 consultation, concerns were raised regarding the Council's compliance with the SCI, particularly in relation to the accuracy and completeness of the consultation database and the Regulation 22 Statement [SUB12]. Following the submission of the Plan, the Council identified several issues with the consultation database, including misaligned representations, policy tagging errors, and missing or incomplete submissions.
- 1.12.2 In response to these concerns and at the Inspector's request, the Council undertook a comprehensive review of the database between August and November 2024 to ensure its accuracy, completeness, and compliance with GDPR requirements. This effort resulted in the publication of an updated database of representations and a revised Regulation 22 Statement [SUB12.1].
- 1.12.3 Following correspondence from the Western Enfield Residents' Association (WERA) on 2 December 2024 and a subsequent communication from the Programme Officer on 18 December, it was identified that WERA's representation had been omitted from the consultation database. The Council confirmed that WERA's representation, submitted via the Enfield Society's portal on 19 May 2024, was valid and had been received within the consultation period.
- 1.12.4 To address this oversight, the Council accepted WERA's representation into the consultation process and notified the Inspector via a confirmation letter dated 23 December 2024. This representation was included in the updated database of representations published on 13 December 2024, ensuring GDPR compliance and addressing WERA's concerns regarding transparency and accuracy.
- 1.12.5 Towards the end of December 2024, the Council collaborated with the Enfield Society to resolve discrepancies in representation data submitted during the consultation process. Issues included 85 missing names and 446 missing representations, identified through inconsistencies between the Council's index and the data provided via the Enfield Society's webform. The Enfield Society outlined three categories of discrepancies: (1) representation counts that matched, (2) fewer recorded representations, and (3) entirely missing names. A ZIP file with 773 representations was provided, including potentially redundant entries, but challenges arose due to the Council's CSV index lacking specific policy identifiers.

- 1.12.6 To resolve these issues, the Enfield Society re-ran scripts to clarify discrepancies and provided guidance for identifying missing names. The Council actively facilitated secure data sharing, requested detailed lists, and worked to reconcile the discrepancies. Significant progress had already been achieved through previous updates [see E7.1], and the remaining issues were addressed ahead of the 8 January 2025 deadline. This proactive approach underscores the Council's commitment to the integrity of the consultation record.
- 1.12.7 The Council is confident that all consultation responses have been obtained, reviewed, and made available to the examination. The Council is not aware of any party who has been prejudiced by the issues referred to above. Any party claiming prejudice would need to demonstrate substantial disadvantage that could not be addressed during the examination process (see R (CK Properties (Theydon Bois) Ltd) v Epping Forest DC [2018] EWHC 1649 (Admin), [85]; R (IM Properties Development Ltd) v Lichfield DC [2014] EWHC 2440 (Admin), [114]; Kendall v Rochford DC [2014] EWHC 3866 [122]).
- 1.12.8 The principal issue with the consultation database was the omission of certain representations due to data collation errors. These omissions have now been rectified, and all representations are before the Inspector for consideration. The Council acknowledges that these errors may have affected the Programme Officer's ability to notify some representors about examination hearings, as the notification process relied on the database's completeness.
- 1.12.9 To address this, the Council conducted a thorough review of the database, cross-referenced missing data, and provided the Programme Officer with updated information on affected representors. It is confirmed that representors listed on the database were notified of the examination hearings as per standard procedure. The Council is committed to ensuring no representor is disadvantaged in the process and has included these corrective actions in its updated position statement.
- 1.12.10 The Council's proactive steps, detailed in its Public Engagement Position Statement [E7.1], demonstrate its dedication to transparency, accountability, and the participatory principles of the SCI. These actions ensure the integrity of the consultation process and compliance with statutory requirements.
- 1.12.11 Yes, the Enfield Local Plan has been prepared in accordance with the statutory requirements of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012. The Public Engagement Position Statement outlines the detailed steps taken by the Council to meet these legal obligations.
- 1.12.12 Key points of compliance include:
- The Regulation 19 consultation was held from 28 March 2024 to 20 May 2024, meeting statutory requirements.

- The Council published and made consultation documents widely available via its website, libraries, and the Civic Centre.
- The process was advertised through public notices, press releases, and targeted notifications, ensuring accessibility and transparency.

1.12.13 Further details on statutory compliance are provided in the Regulation 22 Consultation Statement [SUB12.1] and the Public Engagement Position Statement.

Q1.13. Were adequate opportunities made available for participants to access and make comments on the Plan and other relevant documents?

Response

1.13.1 Yes, the Council provided multiple opportunities for stakeholders to access the Plan and submit their feedback in accordance with its Statement of Community Involvement (SCI).

1.13.2 As outlined in the Public Engagement Position Statement, key measures included:

- Online and physical access: Documents were published online and made available at libraries and the Civic Centre.
- Multiple submission methods: Representations could be submitted via email, post, or using the Council's representation proforma.
- Engagement sessions: Drop-in sessions were held to provide residents with opportunities to interact directly with officers, ask questions, and provide feedback.
- Flexibility: The use of the representation proforma was not mandatory, ensuring inclusivity.

1.13.3 The consultation achieved significant participation, with over 5,000 respondents. Full details are included in Regulation 22 Consultation Statement [SUB12.1].

Q1.14. Have representations been adequately taken into account?

Response

1.14.1 Yes, all representations received during the consultation period have been thoroughly reviewed. To ensure that representations were adequately taken into account, the Council incorporated them into the revised Regulation 22 Statement and analysed their content to identify recurring themes, key issues, and areas requiring policy refinement. Representations informed a range of modifications and actions, including:

- **Tall Buildings (Policy DE6):** Feedback raised concerns about the inclusion of "topography" and "civic buildings" in the policy, prompting the Council to retain these elements as essential considerations for managing the impact of tall buildings on local character and heritage. Representations also contributed to clarifications regarding height thresholds and exceptions, aligning with a design-led approach while addressing local sensitivities.
- **Transport Infrastructure:** Representations from groups such as TfL highlighted the need for improved sustainable transport access to key sites, including Crews Hill and Chase Park. In response, the Council updated the Infrastructure Delivery Plan (IDP) to include proposals for active travel infrastructure, enhanced bus routes, and parking standards aligned with car-free and car-lite development principles. Collaboration with TfL ensured these updates addressed Good Growth principles and London Plan objectives.
- **Site Allocations:** Concerns about site-specific considerations, including accessibility, density, and environmental impacts, led to refinements in site allocation policies. For example, representations on Green Belt release at Crews Hill and Chase Park informed the Council's evidence base, with a focus on demonstrating exceptional circumstances and balancing growth with environmental sustainability.
- **Data Integrity:** Following collaborative efforts with stakeholders like the Enfield Society, the Council identified and resolved discrepancies in consultation data. This included addressing 85 missing names and 446 omitted representations, ensuring that all feedback was accurately recorded and made available for examination. This process highlighted the Council's commitment to transparency and accountability in considering public input.
- **Policy Refinements:** Representations related to employment land led to updates in Table 9.1, distinguishing between requirements for B2/B8 uses and Core Industrial activities. Similarly, feedback on the monitoring framework influenced the introduction of enhanced targets for tracking delivery against industrial and logistics needs.

1.14.2 Representations also prompted further evidence gathering or policy clarifications to ensure alignment with community and stakeholder expectations. For example, additional engagement with the GLA addressed outstanding concerns regarding industrial land policies, while collaborative discussions with TfL resulted in strengthened policies to support sustainable transport and active travel infrastructure.

1.14.3 These actions demonstrate how the Council has proactively engaged with representations to shape the Local Plan, ensuring that public concerns and aspirations are integrated into its policies and proposals. This inclusive approach underscores the Plan's alignment with statutory and regulatory requirements while reflecting the diverse needs and priorities of Enfield's

communities. Further details can be found in the Public Engagement Position Statement and the Regulation 22 Statement.

Q1.15. Is there any clear evidence that the public consultation carried out during the plan-making process failed to comply with the Council's SCI or any other legal requirements?

Response

1.15.1 No, there is no evidence that the public consultation failed to comply with the Council's SCI or statutory requirements.

1.15.2 While challenges were identified, such as spam filtering, email delivery issues, and duplicate submissions, these were addressed proactively. As detailed in the Position Statement:

- Officers monitored the Local Plan inbox daily to ensure representations were logged accurately.
- Collaboration with local interest groups enabled the integration of any missing representations, including paper submissions.
- A rigorous database review was conducted to resolve concerns and ensure completeness.

1.15.3 These actions demonstrate the Council's adherence to the principles of transparency, inclusivity, and accountability as set out in the SCI.

Issue 1.4: Sustainability Appraisal

Q1.16. As part of the integrated impact assessment (IIA), has the formulation of the Plan been based on a sound process of sustainability appraisal? In particular:

- a) Has the IIA been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004?
- b) Does the IIA test the Plan against reasonable alternatives, including in terms of the scale of housing and employment growth, the broad distribution of development and site allocations and policies?
- c) Has the IIA been robustly prepared with a comparative and equal assessment of each reasonable alternative?
- d) Is the IIA decision making and scoring robust, justified and transparent?
- e) Has the Council provided clear reasons for not selecting reasonable alternatives?
- f) Is it clear how the IIA has influenced the Plan strategy, policies and proposals and how mitigation measures have been taken account of?
- g) Have any concerns been raised about the IIA and, if so, what is the Council's response to those?

Response

1.16.1 This response should be read alongside the Council's responses to Q4.2 and Q5.2, and Issue 5.5.

1.16 (a) Has the IIA been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004?

1.16.2 Yes, the IIA has adequately and appropriately assessed the likely environmental, social and economic effects of the Plan in conformity with the requirements of the SEA Regulations. Table 1.1, pages 6-8 of the IIA Report [SUB8] sets out the requirements of the SEA Regulations and where these have been addressed within the IIA Report. The likely significant effects of the Plan in relation to relevant environmental, social and economic objectives are reported in:

- **Chapter 4:** findings for the Plan vision, objectives and strategic policies SP SS1 and SPSS2 from Chapter 2 of the Plan;
- **Chapter 5:** findings for the Place policies from Chapter 3 of the Plan;
- **Chapter 6:** findings for the strategic and development management policies from Chapters 4 to 15 of the Plan; and

- **Chapter 7:** cumulative effects.

1.16 (b) Does the IIA test the Plan against reasonable alternatives, including in terms of the scale of housing and employment growth, the broad distribution of development and site allocations and policies?

1.16.3 Yes, as described in Chapter 2 of the IIA [SUB8], the likely effects of reasonable alternatives to the Plan's proposed approaches have been tested by the IIA, including in terms of all of the aspects of the Plan identified in Q1.16(b). Further information is provided below.

Scale of growth and broad distribution of development

1.16.4 In the 2018 Issues and Options draft new Local Plan [ISO1] (Chapter 2, pages 38-55), Enfield Council identified seven broad strategic growth options for distributing housing and employment development across the Borough. The IIA findings for these strategic growth options were presented in the IIA report at Regulation 18 Draft Local Plan ("Main Issues and Preferred Approaches") stage in 2021 and reproduced in Appendix H, pages H6-H17 to the Regulation 19 IIA report [SUB8]:

- Option 1: Main town centres and areas around all stations;
- Option 2: Transport corridors;
- Option 3: Existing estate renewal and regeneration programmes;
- Option 4: Eastern corridor and low density industrial areas;
- Option 5: Future Crossrail 2 Growth Corridor;
- Option 6: The New Southgate and Upper Lee Valley Opportunity Areas; and
- Option 7: Strategic plan-led approach to Green Belt.

1.16.5 Options for the total amount of housing growth to be provided were considered at Regulation 18 Draft Local Plan ("Main Issues and Preferred Approaches") stage in 2021. An annual housing requirement for Enfield of 1,246 homes per annum up until 2028/29 is set by the adopted London Plan (2021), therefore the submitted Plan provides for this scale of housing growth and no reasonable alternatives were considered. The London Plan does not set a requirement for the period between 2029 and the end of the Enfield Plan period (2039 at the time of Regulation 18 consultation but subsequently extended to 2041). Beyond 2029, three reasonable alternatives were identified:

- **Baseline growth:** To deliver around 17,000 homes over the Plan period - 1,246 homes per year to 2029 and then reverting to the existing level of supply which is around 500 homes per year.

- **Medium growth:** To deliver 25,000 homes over the Plan period - 1,246 homes per year to 2029 and then continued per year across the Plan period.
- **High growth:** To deliver 55,000 homes across the Plan period: 1,246 houses per year plus the additional amount required to meet the gap of provision in relation to the Objectively Assessed Housing Need (OAHN - the adopted London Plan does not meet the OAHN as calculated by the Mayor at the time of preparing the London Plan).

1.16.6 The following broad options for the spatial distribution of different scales of growth were identified and tested at Regulation 18 Draft Local Plan (“Main Issues and Preferred Approaches”) stage in 2021; the findings were also reproduced in Appendix E, pages E1-E12 to the Regulation 19 IIA report [SUB8]. More options were tested by the IIA than were described in Table 2.2 of the Regulation Draft Local Plan [Reg 1, pages 26-29] as the Draft Plan did not include those reasonable alternatives that the Council quickly discounted as not being realistic:

- **Option 1A Baseline growth:** This is based on accommodating 17,000 new homes with some other land uses, including limited nature recovery and green and blue infrastructure improvements. Growth is distributed in the urban area only.
- **Option 1B Baseline growth** [although tested by the IIA, this option was quickly discounted by the Council so does not appear in Table 2.2 of the Regulation 18 Draft Local Plan]: Similar to Option 1A, growth is distributed in the urban area and employment areas.
- **Option 2A Medium growth** [this is Medium Growth 2 in Table 2.2 of the Regulation 18 Draft Local Plan]: Medium growth in the urban area and employment areas.
- **Option 2B Medium growth** [although tested by the IIA, this option was quickly discounted by the Council so does not appear in Table 2.2 of the Regulation 18 Draft Local Plan]: This is based on accommodating approximately 25,000 new homes with a full range of land uses, including extensive nature recovery and green and blue infrastructure investment with growth distributed in the urban area, employment areas and some release of the Green Belt.
- **Option 2C Medium growth** (selected as the preferred option at Regulation 18 stage): Similar to Option 2B, this option looks to accommodate 25,000 new homes, largely focused in the urban area some release of Green Belt. Growth is largely focused in the seven urban placemaking areas and the two rural placemaking areas. A zoning approach is taken to most of the rural areas to facilitate development of multi-layered mosaic of sustainable rural land uses and creation of National Park city designation area. No release of SIL.

- **Option 2D Medium growth** [although tested by the IIA, this option was quickly discounted by the Council so does not appear in Table 2.2 of the Regulation 18 Draft Local Plan]: Similar to Options 2B and C, this option looks to accommodate 25,000 new homes focused in the urban area only.
- **Option 3A High growth** [although tested by the IIA, this option was quickly discounted by the Council so does not appear in Table 2.2 of the Regulation 18 Draft Local Plan]: This option is based on 55,000 homes, largely delivered in the urban area only.
- **Option 3B High growth** [although tested by the IIA, this option was quickly discounted by the Council so does not appear in Table 2.2 of the Regulation 18 Draft Local Plan]: Similar to Option 3A, but the focus is in the urban area and employment areas.
- **Option 3C: High growth** [this is High Growth in Table 2.2 of the Regulation 18 Draft Local Plan]: Similar to options 3B and C, this is widespread growth across the Borough including the urban area, employment areas and the Green Belt.
- **Option 3D High growth** [although tested by the IIA, this option was quickly discounted by the Council so does not appear in Table 2.2 of the Regulation 18 Draft Local Plan]: Similar to Option 3A, growth is focused in the urban area and Green Belt.
- **Option 4:** seeking to accommodate most growth outside the Borough. Option was initially identified but was not tested by the IIA as a reasonable alternative as it is outside the geographical scope of the Local Plan.
- **Option 5:** seeking to accommodate most of the development in the urban area to the east of the A10.
- **Option 6:** seeking to accommodate majority of development in the urban area to the west of the A10.

1.16.7 While the alternatives selected were not defined by reference to different scales of employment growth, the “Baseline growth” options involved delivering in existing urban areas with no release of SIL or Green Belt. The 2021 Main Issues and Preferred Approaches draft Plan document [REG1] noted (Table 2.2, pages 26-29) that in those scenarios, non-housing land use requirements are not met or only partially met. It further noted (paragraph 9.1.2, page 228) that “An assessment of potential development sites has demonstrated that the Borough cannot accommodate all our anticipated employment needs solely within the urban area. By confining industrial and logistics development to the urban area Enfield would only meet approximately 48% of the borough’s additional need for these types of businesses.”

1.16.8 Subsequent to the Regulation 18 stage in 2021, a number of material changes in circumstances occurred:

- Additional opportunities for accommodating development with the urban areas of the Borough identified on newly identified sites and due to updated capacity and phasing assumptions for previously identified sites.
- It would take longer than assumed in 2021 to develop the two rural placemaking areas (Crews Hill and Chase Park).
- Plan period extended from 2039 to 2041.

1.16.9 To reflect these changes in context and for completeness, the Council identified three new spatial strategy options for testing by the IIA at Regulation 19 stage; the IIA findings for these spatial options are presented in Appendix E, pages E13-E21 to the Regulation 19 IIA report [SUB8]:

- **Option 7: Revised Baseline Growth** - This is based on accommodating 30,000 new homes and some other land uses within urban areas only (and is in effect, an update to Option 1A). It reflects the additional sites identified since the Regulation 18 stage, and the further work undertaken to assess and optimise delivery on sites proposed for allocation in the urban areas. Alongside this development there is scope for some nature recovery and green and blue infrastructure improvements.
- **Option 8: Medium to High Growth with two Rural Placemaking Areas** (selected as the Preferred Option) - This option looks to accommodate 34,500 new homes, largely focused in the urban area with some release of Green Belt. Growth is largely focused in the eight urban placemaking areas and the two rural placemaking areas. A zoning approach is taken to most of the rural areas to facilitate development of a multilayered mosaic of sustainable rural land uses, ambitious nature recovery and rewilding. Intensification of existing industrial areas and new sites in urban and rural areas. No release of SIL.
- **Option 9: Medium to High Growth with one Rural Placemaking Area** - This option looks to accommodate 31-32,000 new homes, largely focused in the urban area with some release of Green Belt. Growth is largely focused in the eight urban placemaking areas and on one rural placemaking area (either Crews Hill or Chase Park). A zoning approach is taken to some of the rural areas to facilitate development of a multilayered mosaic of sustainable rural land uses, nature recovery and rewilding. Intensification of existing industrial areas and new sites in urban and rural areas. No release of SIL.

Site allocations

- 1.16.10 Site allocations options were tested by the IIA at Regulation 18 Draft Local Plan stage in 2021. The process followed by the Council to identify reasonable alternatives is described at paragraphs 2.51-2.54, pages 20-21 of the Regulation 19 IIA report [SUB8]. The findings of the IIA of these site options are reproduced in Appendix G, pages G2-G24 of [SUB8].
- 1.16.11 A second round of testing of site options by the IIA took place at Regulation 19 stage in 2023. This updated and revised consideration of site options allowed the Council's latest call for sites (June-July 2022) and updated HELAA to be reflected. The process followed by the Council to identify reasonable alternatives is described at paragraphs 2.56-2.61, page 22 of the Regulation 19 IIA report [SUB8]. The findings of the IIA of these site options are reproduced in Appendix F, pages F3-F32 of [SUB8].

Policies

- 1.16.12 The main focus of the IIA's testing of reasonable alternatives was in relation to the scale and broad distribution of growth and site allocations, as described above. Where the Council identified draft policy approaches in relation to other aspects of the Plan, these were also tested through the IIA as follows:
- High-level policy approaches were set out in the 2018 Issues and Options (Regulation 18) document [IOS1] under the broad themes of historic environment, design, housing, economy, town centres, social infrastructure, green infrastructure, transport and sustainable infrastructure. The IIA findings for these policy approaches were presented in the IIA report at Regulation 18 Draft Local Plan ("Main Issues and Preferred Approaches") stage in 2021 and reproduced in Appendix H, pages H17-H35 to the Regulation 19 IIA report [SUB8].
 - Early drafts of the policy approaches included in the Regulation 18 Draft Local Plan ("Main Issues and Preferred Approaches") document were appraised in May 2021 and the IIA findings and related recommendations provided to the Council as an internal document. These helped to inform the finalised preferred approaches that were then also tested through the IIA and reported in the final version of the IIA report that accompanied Regulation consultation on the Main Issues and Preferred Approaches.

1.16 (c) Has the IIA been robustly prepared with a comparative and equal assessment of each reasonable alternative?

AND

1.16 (d) Is the IIA decision making and scoring robust, justified and transparent?

- 1.16.13 As stated in responses to Q1.16(a), the IIA has adequately and appropriately assessed the likely environmental, social and economic effects of the Plan in

conformity with the requirements of the SEA Regulations and is therefore considered robust. Reasonable alternatives were identified at various stages in the development of the Plan, as described in response to Q1.16(b).

- 1.16.14 At each stage of the Plan's development, all reasonable alternatives under consideration for a particular aspect of the Plan (e.g. alternative spatial strategies; alternative site allocation options) were appraised on a consistent basis at that stage, i.e. against the same criteria and to the same level of detail. This consistency was aided by appraising all alternative and preferred approaches against a common set of IIA objectives. This 'IIA framework' (Table 3.2, pages 63-68 of [SUB8]) was informed by an analysis of the policy context, baseline conditions and key issues relevant to the Plan area, drawing on relevant, available evidence. Taken together, the framework of IIA objectives addressed all of the types of issue (biodiversity, soil, water etc) that the SEA Regulations require to be considered.
- 1.16.15 Assessing the likely effects of options and policies and their significance inevitably requires a series of judgments to be made. The appraisal attempted to differentiate between the most significant effects and other more minor effects but the dividing line in making a decision about the significance of an effect is often quite small (see, for example, the discussion about significant vs. minor negative effects of different spatial strategy options on crime and community safety at paragraph E.12, pages E8-E9 of Appendix E, SUB8]. Where the IIA distinguished significant effects from more minor effects this is because the effect of an option or policy in relation to the IIA objective in question was judged to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, effects are relative to the scale of proposals under consideration. Each IIA objective was supported by a set of appraisal questions that helped to guide these judgements on whether a particular element of the Plan is likely to help the achievement of the objective in question. The intended scope and level of detail of the IIA, including this IIA framework, were refined in consultation with statutory consultees early in the IIA process.
- 1.16.16 Consistent and transparent appraisal of site allocation options was further ensured by use of a clear set of decision-making criteria and assumptions (Appendix B, Table B1, pages B2-B21 of the IIA report [SUB8]) for determining significance of the effects in relation to each IIA objective, based on factors such as site location in relation to sensitive environmental receptors and proximity to key services and facilities.
- 1.16.17 The findings of the IIA were clearly presented using colour coded symbols to summarise the significance and direction (positive or negative) of the effects of each option/ preferred approach against each one of the IIA objectives. These significance scores were accompanied by clear justifications for the effects identified.

1.16 (e) Has the Council provided clear reasons for not selecting reasonable alternatives?

1.16.18 As stated in response to Q1.16 (b), the main focus of the IIA's testing of reasonable alternatives was in relation to the scale and broad distribution of growth and site allocations. Summaries of the Council's reasons for preferring certain approaches and not taking forward reasonable alternatives to these are provided in the following sections of the IIA report [SUB8].

Reasons for selecting or discounting reasonable alternatives for the scale and broad distribution of growth

1.16.19 As explained in the Spatial Strategy Topic Paper [TOP1, paragraph 6.13, page 18], the broad strategic growth options consulted upon (listed in response to Q1.16b) were not mutually exclusive and none of them would be able to deliver the overall growth required for the Borough on its own. As such, these options served to promote early consideration of the choices that would need to be made about which elements might form a future spatial strategy to be taken forward in the ELP. Given this status and the changes in context since the 2018 consultation (including changes in government planning policy, the COVID-19 pandemic, and the recent adoption of the London Plan), it was not considered necessary for the IIA to document the Council's reasons for selecting the options or not.

1.16.20 The Council's reasons for selecting or discounting the reasonable alternative growth options considered at Regulation 18 Draft Local Plan ("Main Issues and Preferred Approaches") stage in 2021 are summarised in Table 2.1, pages 14-16 of the IIA report [SUB8].

1.16.21 The Council's reasons for selecting or discounting the reasonable alternative growth options considered at Regulation 19 stage in 2023 are summarised in Table 2.2, pages 17-19 of the IIA report [SUB8].

Reasons for selecting or discounting reasonable alternatives for the site allocations

1.16.22 The Council identified site options and selected its preferred allocations by application of a six-stage process detailed in its Site Selection Methodology and summarised in Table 2.3, page 20 of the IIA report [SUB8]. For the sites identified through this process as reasonable alternatives to be subject to IIA, the Council's reasons for selecting the allocated sites and discounting the other reasonable alternatives are summarised in Appendix I, pages I2-I71 of the IIA report [SUB8].

1.16 (f) Is it clear how the IIA has influenced the Plan strategy, policies and proposals and how mitigation measures have been taken account of?

1.16.23 IIA was undertaken as an iterative process, allowing it to inform the preparation of the Plan, having regard to the flowchart at Planning Practice Guidance

paragraph 11-013-20140306. Chapter 2 of the IIA report [SUB8] describes the IIA work carried out at each of the stages set out in the Planning Practice Guidance flowchart. Key opportunities that this iterative IIA process afforded the Council to take into account IIA findings and thereby avoid or reduce potential adverse effects are outlined below.

- 1.16.24 The IIA process began with the production of an IIA Scoping Report for the Local Plan, prepared by AECOM in 2020. This identified existing sustainability problems facing the Borough that the Council could seek to address through the Plan (e.g. poor air quality) and a related set of IIA objectives against which the Plan and reasonable alternatives would be assessed (e.g. minimise air pollution).
- 1.16.25 Identification of existing problems through IIA Scoping informed identification by the Council of alternative Plan responses to deal with these problems. The alternatives considered are described in response to Q1.16(b), as is the process by which the IIA tested these and reported findings to the Council throughout the Plan's development. The IIA considered, for instance, the extent to which different spatial strategy options considered at different stages of plan making direct development towards locations that minimise the need to travel and support modal shift away from the private car (see [SUB8] Appendix H, paragraphs H.43-H45, page H-14; Appendix E, paragraph E.17, page E-10; Appendix E, paragraphs E58-E59, pages E18-E19). This iterative approach to the IIA helped adverse effects to be avoided by identifying the potential for these to arise at an early stage in policy development.
- 1.16.26 Once the Council had selected its preferred approaches, the IIA also assessed the likely effects of each of these. The IIA appraised early drafts of emerging policies at both Regulation 18 and 19 stages during May 2021 and September-November 2023, respectively, and provided recommendations to the Council to help improve the sustainability of the policy requirements. For example, the IIA appraised an early draft of a strategic policy (numbered SP19 at the time of appraisal) entitled 'Responding to the Climate Emergency', during the run up to Regulation 18 consultation in May 2021. The IIA recommended that the policy should contain more specific wording on measures that could help with climate change adaptation, such as orientation of buildings and trees for shading. This led to the following policy requirements being added to the Plan by the Council:
- Policy SE1: Responding to the Climate Emergency, part 6 of the policy seeks to "ensure development is designed for resilience in a changing climate.... through considering the orientation of buildings and using trees for shading" (see [SUB2], page 119).
 - Policy SE6: Climate Change Adaptation and Managing Heat Risk. Part 1 of the policy requires developments to: "a. provide adequate mitigation measures to minimise overheating including landscaping, tree planting and the use of blue-green infrastructure; and b. optimise the layout, orientation, materials, technology and design of buildings and spaces to minimise any

adverse impacts on internal and external temperature, reflection, overshadowing, micro-climate and wind movement.” (see [SUB2, page 129).

1.16.27 The IIA recommendations and how they were addressed by the Council throughout the plan-making process are set out in Table 2.5, pages 24-30 of the IIA report [SUB8].

1.16 (g) Have any concerns been raised about the IIA and, if so, what is the Council's response to those?

1.16.28 Concerns raised about the IIA are outlined below, together with the Council's responses to them.

Concern (1)

1.16.29 Troy Planning + Design on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood Forum (representations 01311-3-1 and 01311-3-5); Hadley Wood Association (representation ID 01311-5-1); The Hadley Wood Neighbourhood Planning Forum (rep ID 01669-2-1): raised a variety of concerns about the IIA in relation to site allocation RUR.02: Land between Camlet Way and Crescent West, Hadley which is allocated for 160 homes by Policy H1 Housing Development Sites (N.B. the site ID shown in the IIA and in the Council's Policies Map [SUB7] is R.02). The main concerns about the IIA raised in these representations are summarised below, alongside the Council's responses to them.

Concern (2)

1.16.30 Concern (attachment 1 to representation 01311-3-5, paragraph 65): *“In percentage terms, the site is expected to have a negative effect (significant or minor) against 67% of the indicators that are considered applicable to the site. By contrast, it is only expected to have a positive effect (minor or significant) against 15% of the indicators. This makes a compelling case against allocation of the site.”*

Responses to Concerns 1 and 2.

1.16.31 The IIA testing of all allocated sites used the 2023 'policy-off' appraisals of the corresponding site options as a starting point. The policy-off appraisal was carried out using GIS to apply the decision-making criteria and assumptions set out in Appendix B, Table B1, pages B2-B21 of the IIA report [SUB8]; the findings are reported in Appendix F, Table F.1, of the IIA report [SUB8] with the findings for site RUR.02/R.02 on page F8. As stated in the methodology of the IIA report, [SUB8], paragraph 2.78, page 33, the 'policy-off' appraisals of site options were “based on existing conditions and without taking into account opportunities to mitigate potential negative effects by, for example, providing new social infrastructure, by development design that seeks to minimise effects, or by site layouts that avoid sensitive environmental receptors within the site boundary. This served to highlight potential effects on the environment and

potential gaps in existing services, facilities and sustainable transport links.” It is therefore unsurprising that a large proportion of the effects identified for both site RUR.02/R.02 and many other site options were negative.

1.16.32 The IIA then considered whether any requirements contained in site-specific allocation policies would modify these ‘policy-off’ effects. Site RUR.02/R.02 is listed alongside all of the Plan’s other housing allocations in Policy H1. Policy H1 does not set out any requirements for individual sites and site RUR.02/R.02 is not the subject of a site-specific allocation policy elsewhere in the Plan (these are the Place policies in Chapter 3 of the Plan, the appraisals of which are presented in Chapter 5 of the IIA). Since there was no allocation policy for RUR.02/R.02 whose requirements might modify the ‘policy-off’ findings, the effects identified for the allocation remained those identified by the ‘policy-off’ appraisal of the site option. For site allocations like RUR.02/R.02 that lacked a site-specific allocation policy (those outside the placemaking areas), it was judged proportionate for the IIA to take a higher-level approach to consideration of mitigation than for those with site-specific allocation policies. Policy-off effects scores were presented for each site (see Table 6.8 of the IIA for the sites listed in Policy H1; Table 6.10 for the sites listed in Policy E1) then, rather than considering mitigation on a site-by-site basis, the site proformas in Appendix C of the Plan were reviewed and a commentary provided on the extent to which the policy-off scores for these sites might be mitigated by the types of requirement set out in Appendix C of the Plan (see paragraphs 6.90-6.108 of the IIA for the sites listed in Policy H1; paragraphs 6.123-6.140 for the sites listed in Policy E1).

1.16.33 However, as stated in the Cumulative Effects chapter of the IIA report [SUB8], paragraph 7.1, page 185: “...many of the potential negative sustainability effects identified for individual provisions for development will be reduced or avoided by strong policy requirements governing all development in the Borough.” The IIA goes on to conclude (paragraph 7.59, page 205) that: “...the preferred approach set out in the Publication Local Plan is likely to have an overall positive cumulative effect in relation to achieving the majority of the IIA objectives, covering social, economic and environmental issues, health and equalities and community safety. Where there are potential negative effects identified (e.g. on biodiversity, historic environment, landscape/townscape, water quality), these are uncertain because they will depend on the detailed design and layout of new developments proposed on allocated sites, which are unknown at this stage.”

1.16.34 Even if the mitigation provided by the Plan’s other policies did not exist, such that the majority of the effects identified for the site allocation remained negative, it does not follow that the overall effect of allocating the site would be negative. This is because the IIA objectives cannot be assumed to be equally important; instead it is for the Council to consider the relative importance of different objectives and to consider the findings of the IIA alongside other evidence in coming to a decision on whether to allocate a site.

Concern (3)

- 1.16.35 Concern (Attachment to representation 01311-5-1, paragraphs 4.6-4.7): The 'N/A' score identified for the site allocation in relation to IIA objective 1: Climate change mitigation should be significant negative because of a deficit of amenities and services within a walkable distance (800m) of the site and poor public transport infrastructure in the area (PTAL rating of 1).

Response to concern 3

- 1.16.36 As described in Table B.1: Site assessment criteria and assumptions of the IIA ([SUB8], pages B2-B21), the extent to which the location of development sites would facilitate the use of sustainable modes of transport in place of cars was considered under IIA objective 12: Sustainable Transport. The site received a major negative effect against criterion 12a: Sustainable Transport due to its PTAL rating of 1b. It received a major positive effect against criterion 12b: Services and facilities because it is within 200m of a Local Centre. Combining these two scores resulted in a negligible effect overall in relation to IIA objective 12. These tests were not repeated under IIA objective 1: Climate change mitigation to avoid duplication of assessment.

Concern (4)

- 1.16.37 Concern (attachment to representation 01311-5-1, paragraphs 4.8-4.9): The 'N/A' score identified for the site allocation in relation to IIA objective 2: Climate Change Adaptation should be minor negative because the site is currently greenfield land, the development of which will increase existing flood risk in the area.

Response to concern 4

- 1.16.38 The potential negative effects of loss of greenfield land were assessed under criterion 16a: Brownfield/greenfield land. The site received a major negative effect against this criterion as it contains 3ha or more of greenfield land. This combined with a minor negative effect against criterion 16b: Agricultural Land Classification (due to the presence of Grade 3 agricultural land) to give a combined significant negative effect vs. IIA objective 16: Efficient Use of Land. The potential negative effect of developing in an area of existing flood risk was assessed under IIA objective 17: Flooding. The site received a negligible effect in relation to criterion 17a: Flood Zones as 25% or less of the site falls within Flood Zones 2 or 3. The site received a major negative effect in relation to criterion 17b: Surface Water Flood Risk, as it contains land with a 1 in 30 year risk of surface water flooding. The combined effect in relation to IIA objective 17: Flooding was significant negative. These tests were not repeated under IIA objective 2: Climate Change Adaptation to avoid duplication of assessment.

Concern (5)

- 1.16.39 Concern (attachment 1 to representation 01311-3-5, paragraph 65, first bullet point): The significant positive effect identified in relation to IIA objective 3: Housing is unduly positive and overly simplistic as it fails to consider local needs and mix or delivery timeframes for the site.

Response to concern 5.

- 1.16.40 Policy-off assessment of the site in relation to IIA objective 3: Housing was based on its estimated housing capacity. Consideration of more detailed information on housing provision of the types suggested by the consultee would have been required for all reasonable alternative to ensure a comparable assessment of the site options. This information was not available for all site options and this level of detail is not considered proportionate to IIA of a Local Plan.

Concern (6)

- 1.16.41 Concern (attachment 1 to representation 01311-3-5, paragraph 65, second bullet point): The minor negative effect identified in relation to IIA4: Health and wellbeing is unduly positive. It is unclear how the site can have both a major positive effect against criterion 4b: Access to recreation and a major negative effect against criterion 4c: Loss of recreation; the loss of undeveloped open space should outweigh any positive rating.

Response to concern 6

- 1.16.42 The positive effect identified in relation to criterion 4b Access to recreation results from the presence of a number of areas of public open space within 800m of the site in combination with footpaths or cycle paths within 400m.
- 1.16.43 The negative effect identified in relation to criterion 4c Loss of recreation is because the site intersects with public open space that could be lost to development. As explained in the methodology chapter of the IIA report ([SUB8], paragraph 2.81, page 33), the underlying GIS analysis is deliberately precautionary as it does not take into account the proportion of a site that intersects with an environmental receptor. In this case, manual inspection reveals that the score relates to very small overlaps between the site boundary and the adjacent open space to the north east, probably representing minor inaccuracies in third party digitisation of the respective boundaries. As such, no loss of open space should result from development provided that the Council ensures that the north east boundary of any permitted development accurately follows the edge of the adjacent open space. The overall effect would then be more positive than reported in the IIA.

Concern (7)

1.16.44 Concern (attachment to representation 01311-5-1, paragraphs 4.15-4.18): The minor positive score identified for the site allocation in relation to IIA objective 5: Services and Facilities should be significant negative because:

- The neighbourhood of the allocated site is in the lowest rank (1st rank out of 10) of deprivation for the barriers to housing and services in England.
- There is both a limited supply and high demand for amenities that are accessible to the allocated site and the allocation would increase the residential population of the area by approximately 460 people, increasing the pressure on schools, healthcare facilities, amenities, and recreational facilities.

Response to concern 7

1.16.45 Access to schools was considered under criterion 5a: Education. The site scored minor positive against this criterion and against IIA objective 5: Services and Facilities because it is within 800m of a primary or secondary school. Access to a wider range of services and facilities was considered under other IIA objectives and not repeated under IIA objective 5 to avoid duplication of assessment:

- Access to primary healthcare facilities was considered under criterion 4a: GP Surgeries. The site scored minor negative as it is more than 800m from the nearest NHS GP surgery.
- Access to open space was considered under criterion 4b: Recreation. The site scored significant positive because it is within 800m of open space and within 400m of a foot- or cycle-path.
- Access to the wider range of services and facilities was considered under criterion 12b: Services and Facilities. The site scored major positive because it is within 200m of a Local Centre (Hadley Wood).

Concern (8)

1.16.46 Concern (attachment to representation 01311-5-1, paragraphs 4.22-4.24): The IIA should have identified a minor negative effect rather than a negligible effect for this site in relation to IIA objective 8: Road Safety. This is because:

- There is no walkway on the western part of Wagon Road, to the north of the Site.
- There are no cycle paths in the surrounding area.
- The allocation will increase the number of cars on the road and the A111 Cockfosters Road is already operating at over 100% capacity at peak times.

Response to concern 8

1.16.47 As outlined in Table B.1 of the IIA [SUB8], this IIA objective was scoped out for the assessment of all site options on the basis that the location of development will not significantly affect achievement of this objective. Instead, effects will depend largely on the detailed proposals for sites, such as the incorporation of walking and cycling routes or changes to road junctions, which would be influenced by policies in the Local Plan and details submitted at the planning application stage. Policy requirements in the Local Plan were appraised separately to the site options.

Concern (9)

1.16.48 Concern (attachment to representation 01311-5-1, paragraphs 4.28-4.29): The minor negative effect identified in relation to IIA objective 11: Air Pollution should be significant negative. This is because the limited pedestrian infrastructure, poor transport links and limited services provision in the area would increase the number of car journeys.

Response to concern 9

1.16.49 As set out in Table B.1 of the IIA [SUB8], the assessment of individual site options was based on the variation in baseline concentrations of key air pollutants across the borough and how residential development at different locations would result in different levels of exposure of the residents of newly developed sites to these pollutants. The effects of the development provided for by the Plan on baseline air quality are more appropriately assessed for the Plan as a whole. These are considered in the Cumulative Effects chapter of the IIA ([SUB8, page 201, paragraphs 7.31-7.36).

Concern (10)

1.16.50 The overall effect in relation to IIA objective 12: Sustainable Transport should be significant negative rather than a mix of significant positive and significant negative effects (resulting in a net negligible effect) because:

- The PTAL rating of 1 (the lowest outcome) for the location shows that there is very poor access to public transport infrastructure in the area.
- There is no cycle infrastructure in place and poor footpath connectivity.
- Baseline analysis shows that the area is dependent on cars.

(Attachment to representation 01311-5-1, paragraphs 4.30-4.32)

1.16.51 The major positive effect identified in relation to criterion 12b: Services and facilities is unduly positive, given that the site only receives minor positive effects in relation to IIA objective 5: Services and facilities and IIA objective 10: Town and local centres. Furthermore, the minor negative effect against criterion

4a: GP surgeries undermines the minor positive effect in relation to IIA objective 5: Services and facilities.

(Attachment 1 to representation 01311-3-5, paragraph 65, third bullet point)

Response to concern (10)

- 1.16.52 The site received a major negative effect against criterion 12a: Sustainable Transport due to its PTAL rating of 1b. It received a major positive effect against criterion 12b: Services and facilities because it is within 200m of a Local Centre. Combining these two scores resulted in a net negligible effect overall in relation to IIA objective 12.
- 1.16.53 The decision-making criteria and assumptions for determining significance of the effects of site options in relation to other IIA objectives are clearly set out in Appendix B, Table B1, pages B2-B21 of the IIA report [SUB8]). While some of these are potentially also relevant to IIA objective 12: Sustainable Transport, the site appraisal framework sought to reduce duplication of assessment as far as possible by minimising the use of a single criterion number in relation to multiple IIA objectives.

Concern (11) (representation 01669-2-1)

- 1.16.54 Site RUR.02 is potentially the site of the 1471 Battle of Barnet or at least contiguous with it, affecting its archaeological significance. The site's historical importance has not been adequately considered in the IIA.

Response to concern 11

- 1.16.55 Policy-off appraisals in relation to IIA objective 14: Historic Environment were based on proximity to historic assets (see 'Significance scoring' column of Table B.1 'Site assessment criteria and assumptions' in Appendix B of the IIA report [SUB8]). These criteria look at the proximity of sites to historic assets, namely conservation areas, listed buildings, scheduled monuments, registered parks and gardens, local heritage assets and archaeological priority areas. The policy-off and overall effect identified for site RUR.02 in relation to IIA objective 14: Historic Environment was significant negative with uncertainty, the most negative result possible in this test. This was based on its proximity to historic assets that included the archaeological priority areas that covers the whole extent of the site and the adjacent and partly overlapping conservation area. As such, the IIA correctly identified the historical importance of the site.
- 1.16.56 Additionally, the Council has assured the Hadley Wood Neighbourhood Planning Forum in response to concerns raised during the Regulation 19 consultation that they are aware of the site allocation's archaeological implications. The Council's proforma for the site ([SUB4], Table C1.146, page 512) states: "Historic England has advised that the site is potentially important... and would need pre-determination archaeological fieldwork". It further states that "Development on the site...should comprise typologies that are sympathetic

towards the Hadley Wood Conservation Area [and]...must carefully consider any impacts on the adjacent Monken Hadley Conservation Area”.

Concern (12) Herts & Middlesex Wildlife Trust (rep ID 01852-1-1)

1.16.57 HMWT argues that sites within the Chase Park Placemaking Area have not been adequately assessed for their ecological value and that development could significantly harm biodiversity through land use changes and increased recreational pressure. The representation further states that site 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. Before any development, it calls for comprehensive ecological surveys to establish the biodiversity value of the sites and potential SINC designations and to guide consideration of the housing capacity of the site.

Response to concern 12

- 1.16.58 Strategic Policy PL10: Chase Park allocates four sites: SA10.1, SA10.2, SA10.3 and SA10.4. Appendix F ('IIA findings for the site options 2023') of the IIA report contains 'policy-off' appraisals for each of these sites ([SUB8], SA10.1 on page F-12; SA10.2 on page F-8; SA10.3 on page F-12; and SA10.4 on page F-12). Each site option received a significant negative effect against IIA objective 13: Biodiversity, the most negative effect possible through this testing. As detailed in Table B.1 'Site assessment criteria and assumptions' in Appendix B of the IIA report [SUB8], the policy-off appraisals were based on proximity to a basket of biodiversity assets (internationally or nationally designated sites; SSSI Impact Risk Zones; locally designated sites; Priority Habitat and Ancient Woodland).
- 1.16.59 The policy-off approach was judged proportionate to plan-scale assessment and sufficient to identify the likely significant effects of the Plan, should the sites be allocated without mitigation. However, one of the purposes of testing the options is to highlight potential allocations that require closer examination by the Council to consider whether the potential adverse effects can be avoided or mitigated. Chapter 5 of the IIA report ([SUB8], Table 5.10 and paragraphs 5.108, page 116) contains a 'policy-on' appraisal of these four sites through its appraisal of policy SP PL10 against IIA objective 13: Biodiversity. The policy requires 20% biodiversity net gain and a new and improved green infrastructure network, to support the extension of Trent Country Park. The policy also requires development to protect and enhance the valuable ecological areas within the site. The IIA concluded that these measures were sufficient to mitigate the potential significant negative effects that had previously been identified.

**Concern (13) NHS London Healthy Urban Development Unit (HUDU)
(representation ID 01872-1-41)**

1.16.60 HUDU supports Objective 4 of the Integrated Impact Assessment (IIA) aimed at enhancing health and reducing inequalities but expresses 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.”

Response to concern 13

1.16.61 The IIA considers these areas of concern for every reasonable alternative site option (both within and outside of the Green Belt) by testing:

- the proximity of site options (inside and outside of the Green Belt) to GP surgeries under criterion 4a GP surgeries in the site assessment criteria (see Table B.1 ‘Site assessment criteria and assumptions’ in Appendix B of the IIA report [SUB8])
- proximity to walking and cycling paths, in addition to open space (including MOL and green loops/links), under criterion 4b Access to recreation
- access to public transport (PTAL ratings) under criterion 12a Sustainable transport.

Issue 1.5: Habitats Regulations Assessment

Q1.17. Have any concerns been raised about the HRA and, if so, what is the Council's response to these? Have Natural England been involved in the HRA process and what is their current position?

Response

Concerns raised about the HRA

- 1.17.1 Natural England, as statutory consultant, provided comments (in May 2024, <https://www.enfield.gov.uk/file/PDFs/email/01743-1-1.pdf>) on the HRA during the Reg.19 consultation. In this, they confirmed that Recreation Mitigation Strategy had been agreed with Natural England; but acknowledged that *"the mitigation strategy is subject to confirmation that the visitor uplift calculation remains valid for the latest version of the Local Plan"*.
- 1.17.2 In relation to air pollution, they commented that: *"We agree with the conclusion of the HRA that until the air quality assessment has been completed and if necessary, mitigation agreed, it is not possible to conclude that there will be no adverse effects on the integrity of designated sites as a result of air pollution. We note that paragraph 5.39 of the HRA states that once the air quality assessment has been finalised, the need for mitigation will be identified and if it is found to be needed, will be agreed in consultation with Natural England. Mitigation will need to be agreed and secured prior to adoption of the Local Plan. We look forward to continuing the discussions we are currently engaged in with Enfield Council around air quality, and to working with the Council to address these issues."*
- 1.17.3 Enfield Climate Action Forum (EnCaf) Land Use Working Group also provided comments on the Regulation 19 consultation. They raised a concern that the impact of Meridian Water (Policy PL5) would be greater than reported and that proposed mitigation is insufficient. Key points relating to the HRA are that:
- The HRA reported a figure of 5,686 homes at Meridian Water but the Local Plan states 'at least 6,711' homes to 2041, with 10,000 homes in total.
 - The HRA refers to new multifunctional open space on site, but the adequacy of that greenspace as mitigation is not assessed and the loss of former open space as part of the development is not taken into account. EnCAF query the methodology and calculations.
 - The recreation mitigation strategy identifies improvements to Kenninghall Open Space and connections to nearby greenspaces, as mitigation for development at Meridian Water, but this is not considered sufficient as alternative destination to Epping Forest.

The Council's response: Air Pollution

- 1.17.4 Since the Regulation 19 HRA [SUB11], further work has been undertaken to quantify, assess and conclude issues relating to air pollution, in consultation with Natural England.
- 1.17.5 WSP undertook traffic modelling and air quality assessment to quantify the effects of the Local Plan alone, and in combination with other sources of traffic growth and changes in air pollution. The screening criteria (>1,000AADT, in line with guidance 'LA105 air quality' or 1% of critical load in line with Natural England and IAQM guidance) was predicted to be exceeded on several roads within 200m of Epping Forest SAC, due to the Local Plan alone and in combination. Impacts on Wormley Hoddesdonpark Woods SAC and Lee Valley SPA/Ramsar were ruled out through this work.
- 1.17.6 LUC then undertook an assessment, of the air quality assessment results, to determine whether there would be an adverse effect on the integrity of Epping Forest SAC and therefore whether mitigation would be required. This was written up as a file note titled 'Appropriate Assessment of air pollution' and formed a 'shadow Appropriate Assessment' to advise Enfield Council, as competent authority, on the findings. The assessment was informed by desk study, ecological site visits to Epping Forest, and consultation with Natural England. Natural England were presented with the findings at each stage of the assessment and met to discuss results and give guidance.
- 1.17.7 The shadow Appropriate Assessment (dated 15 October 2024, [E7.2]) advises that the Council is able to conclude that there would be no adverse effects on the integrity of Epping Forest SAC, due to air pollution. On 17 October 2024, Natural England confirmed in writing that they agree with the conclusions of the shadow Appropriate Assessment. No further work is required on air pollution, in the HRA.

The Council's response: Recreation Pressure

- 1.17.8 The principal mitigation for recreation pressure at Epping Forest SAC is the recreation mitigation strategy, which is intended to provide sufficient additional/enhanced greenspace within the borough for all of the new residential development within the borough. The strategy identifies 'SANG' ('suitable alternative natural greenspace') for the total uplift of visitors associated with the Local Plan's new homes within 6.2km of the SAC (the 'zone of influence'). The strategy identifies the site allocations that would be served by each SANG.
- 1.17.9 The recreation mitigation strategy methodology was agreed in consultation and Natural England have approved the final Recreation Mitigation Strategy (published September 2023 [INF1]).
- 1.17.10 The Regulation 19 HRA stated that "*the strategy's authors need to confirm that the calculation of visitor uplift underpinning the strategy remains valid for the latest version of the Local Plan*", and this is reflected in Natural England's Regulation 19 comments [INF1] Enfield Council have since confirmed that the

housing figures underpinning the strategy do align with the most recent version of the Local Plan. Therefore, the visitor uplift calculations remain valid for the latest version of the Local Plan and no additional assessment or mitigation is required in relation to recreation pressure.

- 1.17.11 In relation to Meridian Water specifically (and in response to EnCaf's comments), the recreation mitigation strategy confirms that three SANG schemes have already been consented and agreed with Natural England, providing capacity for 3,276 new homes (Phases 1A, 1B and 2; i.e. sufficient for the 3,213 new homes associated with site allocations SA5.1 and SA5.2). The strategy identifies improvements to Kenninghall Open Space and connections to nearby greenspaces to provide the required uplift to serve the remaining new homes that will come forward during the plan period (i.e. the 3,497 homes associated with site allocations SA5.3, SA5.4, SA5.5 and SA5.6).
- 1.17.12 Appendix C of the Regulation 19 HRA [SUB11] sets out the number of new homes associated with each site allocation. For Meridian Water, this was incorrectly reported as a total of 5,658 (plus one site 'tbc'), based on older information, whereas the total reported in the final version of the Regulation 19 Local Plan is 6,710.
- 1.17.13 Nevertheless, the mitigation for Meridian Water is that set out in the recreation mitigation strategy, which provides mitigation for all 6,710 homes proposed at Meridian Water. On site open space provides additional opportunities for local recreation. The improvements set out in the strategy to local greenspaces are not intended to provide recreation opportunities that are equal to Epping Forest, but are intended to divert a sufficient number of trips by existing and future residents, particularly local trips e.g. for dog walking, that there is no net increase in trips to Epping Forest.
- 1.17.14 The proposals for Kenninghall Open Space include links to other consented SANG schemes, so that the enhancements function as a network of linked greenspaces. Natural England's SANG guidance (which came out of work on the Thames Basin Heaths SPA: www.bracknell-forest.gov.uk/sites/default/files/2021-11/natural-england-sang-quality-guidance.pdf) confirms that linear features and SANG networks can be effective mitigation for recreation pressure. Natural England approved a similar 'toolbox' approach to mitigation for the Enfield strategy.

Q1.18. What are the implications for the Plan of the HRA not being able to rule out adverse effects on the integrity of sites, as set out above and in Chapter 5 of the HRA? How are any uncertainties to be addressed?

Response

- 1.18.1 The Council considers that a conclusion of no adverse effects on the integrity of all relevant European Sites can be reached.
- 1.18.2 Although the Regulation19 HRA was not able to rule out adverse effects on integrity due to air pollution at Epping Forest SAC, work undertaken since has enabled these effects due to the Local Plan alone or in combination to be ruled out. That work is set out in the shadow Appropriate Assessment of air pollution [E7.2], referred to in MIQ 1.17.
- 1.18.3 With confirmation that the recreation mitigation strategy aligns with the quantum of residential development in the Local Plan (see the Council's response to 1.17), there are no outstanding issues relating to recreation pressure. There will be no adverse effects on the integrity of Epping Forest SAC from recreation pressure, due to the Local Plan alone or in combination.

Q1.19. Have the necessary mitigation measures to avoid adverse effects on the integrity of designated sites been incorporated into the Plan's policies?

Response

- 1.19.1 Yes.
- 1.19.2 A number of the impact pathways identified in the Regulation19 HRA as having 'likely significant effects' on European sites rely on safeguards / mitigation within Local Plan policies to avoid adverse effects on the integrity of those sites. These are summarised below:
- **Physical damage and loss of habitat:** Policy SP BG2 (general protection), Policy DM SE8 (development near watercourses).
 - **Air pollution:** no mitigation required (although several policies would contribute to a reduction in air pollution).
 - **Recreation pressure:** at Epping Forest SAC: the Recreation Mitigation Strategy, as embedded in Policy SP BG3, and general protection in Policy SP BG2. At Wormley Hoddesdonpark Woods SAC and Lee Valley SPA/Ramsar: Policies DM CL5, SP BG1, SP BG7, SP PL10, SP PL11 and SP PL5, which make provision for new green/open space. These also provide additional safeguards for impacts at Epping Forest SAC but are not the principal mitigation for recreation pressure at that site.
 - **Water quality / quantity:** run-off / wastewater treatment: Policies DM SE8, DM SE9, SP ENV1, which protect water quality; and Policy SP BG2 (general protection for Lee Valley SPA/Ramsar). Abstraction: Policy DM SE2 (water

efficiency). There are also established regulatory mechanisms for water abstraction and treatment.

1.19.3 As part of the HRA process, recommendations were made to strengthen policy wording to provide the required certainty that mitigation could be achieved. Natural England has agreed with the conclusions of the HRA that rely on the above mitigation.

1.19.4 In their Regulation19 response, Natural England raised comments on two of the policies relied on as HRA mitigation, suggesting that modifications may be required in order to improve clarity or to provide the required certainty. Natural England's position is in *italics*; the Council's position follows in **bold**.

Policy SP BG3: Protecting Epping Forest Special Area of Conservation:

- *“Natural England are supportive of the mitigation measures that are outlined for recreational pressure on Epping Forest SAC that could be caused by new development coming forward as part of the plan. We note that the mitigation strategy is subject to confirmation that the visitor uplift calculation remains valid for the latest version of the Local Plan, and that a further version of the HRA will be submitted.”* – **no further mitigation required; see MIQs 1.17 & 1.18.**
- *“We would recommend clarifying that it is Enfield Council's responsibility as competent authority to produce a Habitats Regulations Assessment for any development which may harm the integrity of a European Site.”* – **A minor modification can be made to effect it would aid clarity.**
- *“Further information is required relating to the mitigation of air pollution and its effect on designated sites beyond the scope of what is covered in policies BG3 and ENV1.”* – **no mitigation required; see MIQ 1.17.**

Policy SP ENV1: Local Environmental Protection:

- *“We welcome Policy ENV1's commitment for all major developments to have to demonstrate that they are at least air quality neutral. As outlined in the Habitats Regulations Assessment this will help reduce air quality impacts on designated European sites. However, more work will need to be done to ensure smaller developments do not harm designated sites.”* – **the impact of the Local Plan as a whole and ‘in combination’ has been assessed as part of the HRA (see MIQ 1.17, [E7.2]) and will not have adverse effects on the integrity of European Sites. No mitigation required.**

1.19.5 The Council is therefore satisfied that the necessary mitigation measures to avoid adverse effects on the integrity of designated sites have been incorporated into the plan's policies.

Q1.20. Overall, has the HRA been carried out in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended) and Habitats Directive?

Response

1.20.1 Yes, the HRA [SUB11] has been carried out in accordance with the Conservation of Habitats and Species Regulations 2017, as amended, and with all relevant case law key findings of which are set out in Chapter 1 of the Regulation 19 HRA.

Issue 1.6: Other Matters

Local Development Scheme

Q1.21. Has the Plan been prepared in accordance with the Local Development Scheme in terms of its form, scope, and timing?

Response

1.21.1 The Enfield Local Plan has been prepared in accordance with the relevant Local Development Schemes (LDS) throughout its plan making stages. Each version of the LDS, including the 2020-2024 and 2023-2027 iterations, provided a framework for preparing the Local Plan, including its form, scope, and timing. The LDSs ensured compliance with statutory requirements for the local community and stakeholders.

Form

1.21.2 The LDS 2024 [SUB16] identifies the Enfield Local Plan [SUB1-7] as a comprehensive development plan document covering the entire Borough. Its purpose is to establish a strategic framework for managing growth, including policies for housing, employment, infrastructure, sustainability, and conservation, aligning with national policy and the London Plan.

1.21.3 The Local Plan reflects the form specified in the LDS, comprising:

- **Strategic Policies:** These guide sustainable development, such as Policy SS1, which sets out the spatial strategy and overarching principles for growth.
- **Thematic Policies:** These address specific topics such as housing, employment, environment, and transport, offering detailed guidance for implementation.
- **Site-Specific Allocations:** These include proposals for key place-making areas, including Meridian Water (PL5), Chase Park (PL10), and Crews Hill (PL11).

1.21.4 This structure ensures the Local Plan adheres to the form outlined in the LDS and provides a clear framework for addressing the Borough's growth and sustainability objectives.

Scope

1.21.5 The LDS 2024 specifies that the Local Plan will:

- Cover the entirety of the Borough.
- Set a vision, spatial strategy, and development management policies.
- Identify key growth areas and sites, such as Meridian Water, New Southgate, Chase Park, and Crews Hill, addressing housing, employment, and infrastructure needs.

1.21.6 The Local Plan adheres to this scope by addressing:

- **Housing Needs:** Policies and site allocations ensure the delivery of 33,280 homes by 2041, supported by evidence from the Housing Needs Assessment [HNE2-3] and Housing Topic Paper [TOP3].
- **Economic Growth:** Policies align with the Employment Land Review (ELR) [EMP1] and Employment Topic Paper [TOP4], targeting 304,000 sqm of industrial/logistics floorspace and 40,000 sqm of office space.
- **Sustainability and Infrastructure:** Policies promote green and blue infrastructure, climate resilience, and strategic infrastructure delivery, ensuring growth is accompanied by appropriate facilities.
- **Site Allocations:** The Plan designates key place-making areas and specific sites for development, consistent with the spatial strategy and the evidence base.

1.21.7 The Plan's thematic and geographic scope is therefore consistent with the objectives and coverage outlined in the LDS.

Timing and compliance with previous versions of the LDS

1.21.8 The LDSs outline a timetable for preparing and adopting the Local Plan, including key milestones:

- **Regulation 18 Consultation:** this initial Regulation 18 consultation conducted between December 2018 and February 2019 over a 12 week period, aligned with the timetable set out in the 2020 LDS effective during this period. This consultation sought public and stakeholder input on the **issues and options** for the Local Plan, helping to shape its vision, objectives, and strategy. The feedback gathered during this stage informed the development of subsequent drafts, ensuring the Plan reflected local priorities and addressed key challenges facing the Borough. The December

2020 LDS also confirmed the completion of this milestone and highlighted the subsequent need for additional evidence base work and consultation to address emerging issues and ensure alignment with national and regional policies.

- **Draft Plan Regulation 18 Consultation:** The Draft Plan consultation in June 2021 adhered to the updated timetable in the December 2020 LDS, which accounted for delays caused by the pandemic and elections. The Council ensured that these adjustments remained consistent with the scope and objectives outlined in the LDS.
- **Regulation 19 Consultation:** Held between March and April 2024 over a period of six weeks. This consultation period allowed stakeholders to provide formal representations on the soundness and legal compliance of the draft Local Plan. The March 2023 LDS confirmed that the Regulation 19 consultation was held. This phase also benefited from refinements introduced through iterative evidence base updates, which were reflected in the evolving LDS.
- **Submission for Examination:** The Plan was submitted for examination on 6 August 2024, meeting the July 2024 LDS timetable.

1.21.9 While minor adjustments were made to ensure the robustness of the Plan, these changes were procedural and did not materially alter its form, scope, spatial strategy or introduced new evidence. The LDS allows for such flexibility to accommodate stakeholder feedback and ensure alignment with evidence.

Pre-Publication Preview

1.21.10 In December 2023, the Council shared a pre-publication preview of the Plan, providing stakeholders with an opportunity to engage with its key components before formal Regulation 19 consultation commenced. This preview was not part of statutory plan-making but demonstrated the Council's commitment to transparency and stakeholder engagement. It allowed for early identification of minor refinements while maintaining consistency with the spatial strategy and evidence base outlined in the LDS. Crucially, no new evidence or significant changes were introduced at this stage, ensuring that the Plan adhered to the form and scope defined in the LDS.

Evidence of Compliance

1.21.11 The Authority Monitoring Reports (AMRs) and supporting documents confirm the Council's adherence to the LDS timetables and milestones. Adjustments to the programme were transparently documented and justified to ensure compliance with statutory requirements under the Planning and Compulsory Purchase Act 2004 (as amended).

1.21.12 The Regulation 22 Statement confirms adherence to the LDS at every stage of the Plan's preparation. It documents the consultation process and demonstrates

how the evidence base, including the Integrated Impact Assessment, Green Belt Assessment, and Infrastructure Delivery Plan, underpins the Local Plan's policies and allocations. These studies ensured that the Plan met statutory and procedural requirements while addressing the Borough's strategic priorities.

Conclusion

- 1.21.13 The Enfield Local Plan has been prepared in full accordance with the Local Development Scheme 2024 as well as previous iterations of the LDS that governed earlier plan making stages. Its form, scope, and timing align with the objectives and provisions outlined in the LDS ensuring consistency and compliance at every stage of preparation. The Plan reflects the strategic and thematic framework specified in the LDS, adheres to the prescribed timetable, and incorporates robust evidence to support its policies.
- 1.21.14 The pre-publication preview in December 2023 further highlights the Council's commitment to transparency, enabling stakeholders to engage with the plan and ensuring the alignment with statutory requirements. The Authority Monitoring Reports and supporting documentation confirm adherence to the LDS timetables and milestones, with necessary adjustments transparently documented and justified. This demonstrates a thorough, evidence-based approach to planning for Enfield's sustainable growth and development.
- 1.21.15 Throughout this process, the Local Plan demonstrates Enfield's commitment to delivering a thorough, evidence-based planning framework that meets statutory and policy requirements for the Borough's future.

Equalities

Q1.22. In what ways does the Plan seek to ensure that due regard has been had to the three aims expressed in s149 of the Equality Act 2010 in relation to those who have a protected characteristic?

Response

Compliance with Public Sector Equality Duty

- 1.22.1 The Enfield Local Plan has been prepared with due regard to the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010. It demonstrates compliance with the three aims of the Act: eliminating discrimination, advancing equality of opportunity, and fostering good relations through its policies, spatial strategy, and evidence base. The Integrated Impact Assessment (IIA) [SUB8], which includes an Equality Impact Assessment (EqIA) as a core component provides a robust foundation for addressing inequalities and meeting the needs of individuals with protected characteristics, ensuring compliance with these duties.

Eliminating Discrimination, Harassment, and Victimization

1.22.2 The Local Plan includes specific measures to eliminate barriers and promote inclusivity, ensuring equitable access to housing, employment, infrastructure, and public services. Key policies include:

Inclusive Design Policies

1.22.3 Policy DE1: High-Quality and Resilient Design ensures that all new developments are accessible, inclusive, and adaptable. Features such as step-free access, adaptable homes, and inclusive public spaces directly benefit individuals with disabilities, older residents, and others who face physical barriers.

1.22.4 The IIA [SUB8] (paragraphs 6.60-6.78) highlights the critical role of inclusive design in addressing the needs of individuals with protected characteristics, fostering independence and accessibility in daily life. It identifies several key benefits linked to Policy DE1:

a) Reducing Physical Barriers:

- Inclusive design features such as step-free access and adaptable homes are highlighted as essential for improving accessibility and mobility for individuals with physical disabilities (paragraph 6.63).
- The IIA emphasises that these measures reduce barriers to everyday activities, fostering greater independence and participation in social and economic life.

b) Enhancing Public Spaces:

- Paragraph 6.65 notes that the design of inclusive public spaces can significantly impact social cohesion by creating environments where individuals of all ages and abilities feel welcome and safe.
- The policy is seen as fostering intergenerational and cross-community interactions, which are critical for fostering good relations between diverse groups.

c) Adapting to Demographic Changes:

- The IIA highlights the importance of adaptable housing in responding to an aging population and increasing diversity (paragraph 6.67). Policy DE1 aligns with this by promoting housing that can accommodate changing needs over time, reducing the need for costly modifications or relocation.

d) Promoting Health and Well-Being:

- Paragraphs 6.72–6.74 note the positive impact of inclusive design on health outcomes. Features such as accessible public spaces and active

travel infrastructure contribute to improved physical and mental well-being, particularly for older adults, young families, and individuals with disabilities.

- The IIA links these improvements to reduced social isolation and greater participation in community activities.

e) Addressing Inequalities:

- The IIA (paragraph 6.76) recognises that inclusive design plays a vital role in tackling structural inequalities by prioritising accessibility for groups historically excluded from planning considerations, such as those with limited mobility or sensory impairments.

f) Climate Resilience and Inclusivity:

The IIA (paragraph 6.78) highlights that inclusive design principles are integral to creating climate-resilient communities. By integrating green infrastructure and designing spaces for thermal comfort and shade, Policy DE1 ensures that urban environments are not only accessible but also adaptable to climate change impacts.

1.22.5 Policy DE1 demonstrates a commitment to inclusivity and equality, ensuring that developments in Enfield contribute to creating accessible, welcoming, and resilient spaces for all. The IIA further validates the importance of these measures in meeting the needs of individuals with protected characteristics, advancing equality of opportunity, and fostering good relations across the Borough.

Housing Policies Addressing Disadvantaged Groups

1.22.6 Policies H1, H2, H3, H4, and H5 are central to addressing the housing needs of disadvantaged groups, including low-income households, older adults, and people with disabilities. The Housing Needs Assessment [HNE2-3] identifies acute pressures faced by these groups, such as overcrowding (paragraph 28) and homelessness (paragraph 21), which the plan addresses through the provision of affordable housing and specialist provision.

1.22.7 The IIA (paragraphs 6.79–6.108) provides a comprehensive evaluation of how these policies support equality, inclusion, and sustainability:

a. Affordable Housing Provision:

- Paragraphs 6.80–6.83 of the IIA highlight the critical role of affordable housing policies (H1 and H2) in addressing the needs of low-income households. By prioritising the delivery of genuinely affordable homes, the policies directly tackle housing insecurity and overcrowding, which disproportionately impact ethnic minority groups and single-parent households.

- The IIA highlights that increasing affordable housing provision will reduce inequality and support greater social mobility.
- b. Specialist Housing for Older People and Disabled Residents:
- Policies H3 and H4 are designed to meet the specific needs of older people and individuals with disabilities. Paragraphs 6.85–6.87 of the IIA highlight the importance of these policies in delivering accessible and adaptable housing, ensuring that vulnerable groups can live independently and safely.
 - The provision of specialist housing is linked to reducing reliance on institutional care and addressing inequalities in access to suitable housing for disabled residents.
- c. Mitigating Overcrowding and Homelessness
- The IIA (paragraph 6.90) emphasises that the policies aim to reduce overcrowding and homelessness, which disproportionately affect low-income families and ethnic minority groups. By providing a mix of housing types, the Plan addresses these structural inequalities, supporting community stability and cohesion.
- d. Equity in Housing Allocations
- Paragraphs 6.92–6.94 of the IIA note that policies ensure equitable distribution of housing across the Borough, particularly in regeneration areas such as Meridian Water and Edmonton Green. This equitable allocation helps address geographic disparities and promotes balanced growth.
- e. Health and Well-Being Benefits
- The IIA (paragraphs 6.100–6.102) identifies significant positive impacts on health and well-being. Improved housing conditions reduce stress, improve mental health, and provide stable living environments for families and individuals.
 - The inclusion of green spaces and access to active travel opportunities in housing developments further enhances physical and mental health outcomes.
- f. Alignment with Climate and Sustainability Goals
- Paragraph 6.104 highlights the integration of energy-efficient housing standards, which contribute to reducing living costs for low-income households and align with climate resilience objectives.
- g. Addressing Spatial Inequalities

- The IIA (paragraphs 6.106–6.108) recognises that these policies contribute to reducing spatial inequalities by focusing on areas with high levels of deprivation. This targeted approach ensures that growth and investment benefit the most disadvantaged communities in the Borough.

1.22.8 By addressing the specific needs of disadvantaged groups through a combination of affordable, specialist, and energy-efficient housing, the Local Plan demonstrates a strong commitment to equality and inclusion. The IIA validates that these housing policies not only meet statutory obligations under the Equality Act but also promote broader social, economic, and environmental sustainability objectives.

Health and Well-Being

1.22.9 Policies SC1 and SC2 are pivotal in ensuring that developments contribute to the provision of health, social care and community infrastructure, with a particular focus on addressing disparities in areas with higher concentrations of disadvantaged groups. These policies focus on addressing disparities by requiring developments to contribute to health and social care facilities, particularly in areas with concentrations of disadvantaged groups.

1.22.10 The IIA (paragraphs 6.18–6.27) provides a detailed assessment of these policies, highlighting their significance in addressing key health and well-being challenges:

a. Improved Access to Healthcare Services

- Paragraphs 6.18–6.20 of the IIA underline the importance of ensuring equitable access to healthcare facilities across the Borough. Policies SC1 and SC2 are identified as critical in reducing disparities in access, particularly in underserved areas in the east of the Borough, where health inequalities are more pronounced.
- The IIA notes that by requiring developments to contribute to healthcare infrastructure, these policies help mitigate pressure on existing services and ensure that new and existing residents benefit from improved health outcomes.

b. Tackling Health Inequalities

- The IIA (paragraph 6.21) highlights how Policies SC1 and SC2 address systemic health inequalities by targeting interventions in areas with poorer health outcomes, higher levels of deprivation, and greater concentrations of ethnic minorities and low-income households. These policies support the delivery of local health and social care facilities that are accessible to vulnerable groups.

c. Promotion of Active Lifestyles

- Paragraphs 6.22–6.24 of the IIA emphasise the positive role these policies play in encouraging active travel and providing recreational spaces. By integrating walking and cycling infrastructure and improving access to green spaces, the policies contribute to increased physical activity levels, which are crucial for addressing chronic health conditions such as obesity and cardiovascular diseases.
- The IIA identifies a direct link between these measures and improved mental health outcomes, particularly for older residents and those from disadvantaged backgrounds.

d. Supporting Mental Health and Well-Being

- The IIA (paragraph 6.25) highlights that enhanced community and recreational spaces, as supported by these policies, have significant mental health benefits. Providing safe, accessible spaces for social interaction and relaxation is recognised as key to fostering a sense of community and reducing social isolation.

e. Alignment with Broader Sustainability Goals

- Paragraphs 6.26–6.27 of the IIA note that these policies align with broader sustainability objectives by promoting environmentally friendly design principles and reducing reliance on private vehicles. This alignment ensures that health improvements are delivered alongside reductions in air pollution and carbon emissions.

1.22.11 Through the integration of healthcare infrastructure, active travel initiatives, and community spaces, Policies SC1 and SC2 demonstrate a commitment to reducing health disparities and improving well-being across the Borough. The IIA validates these policies as instrumental in achieving health equity and fostering sustainable, healthy communities.

Structural Discrimination and Barriers to Access

1.22.12 The IIA [SUB8] evaluates how the Local Plan addresses structural discrimination and reduces barriers to access, ensuring that policies are assessed for their ability to advance equality, benefiting individuals with protected characteristics.

1.22.13 In the area of housing, Affordable Housing Access paragraphs 6.79-6.108 of the IIA the IIA emphasises the significant role of Policies H2 and H3 which directly in addressing inequalities. These policies are designed to meet the needs of low-income households, ethnic minorities, and families disproportionately affected by housing shortages. By delivering affordable housing and tackling issues such as overcrowding and homelessness, which particularly affect certain ethnic groups, the Plan aims to reduce systemic barriers. The IIA underscores that these policies align with the overarching objective of advancing equality by providing targeted solutions to specific housing needs.

- 1.22.14 Employment policies, particularly E1 and E2 are identified in the IIA (paragraphs 6.46–6.59) as critical for fostering inclusive economic development. Focused on areas of deprivation such as East Enfield, these policies support job creation and skills development, with particular benefits for underrepresented groups, including ethnic minorities and women. The IIA highlights how these policies promote opportunities in industrial and logistics sectors, helping to address economic disparities and reduce long-standing inequalities in access to employment..
- 1.22.15 In the area of transport, policies T1 and T2, are acknowledged in the IIA (paragraphs 6.60–6.78) for their role in improving connectivity, particularly for low-income households and individuals with disabilities. By enhancing public transport and reducing reliance on private vehicles, these policies address significant barriers to accessing jobs, education, and healthcare. The IIA also notes the inclusive design principles embedded in these policies, which aim to ensure equitable accessibility across the Borough, thereby advancing equality in mobility and connectivity.

Advancing Equality of Opportunity

- 1.22.16 The Local Plan prioritises inclusive growth, enabling equal access to opportunities and services through targeted interventions.
- 1.22.17 Transport Policies T1 and T2 play a central role, as highlighted in the IIA (paragraphs 6.189-6.196). By enhancing public transport and active travel networks, these policies improve east-west connectivity, reduce isolation, and support communities in underserved areas. The IIA notes that these improvements particularly benefit individuals without access to private vehicles and help to address systemic inequalities in access to employment and education.
- 1.22.18 Regeneration projects such as Meridian Water (PL5) and Edmonton Green (PL3) are also highlighted as critical interventions to tackle spatial inequalities. Paragraphs 5.46-5.56 focus on Meridian Water describing its transformative potential to deliver significant housing, employment opportunities, and social infrastructure, with particular attention to underserved communities. While paragraphs 5.26–5.34 discuss the role of Edmonton Green (PL3) in addressing deprivation through enhanced connectivity, infrastructure investments, and housing delivery. The IIA highlights how these projects tackle spatial inequalities and ensure equitable access to growth opportunities, with particular focus on improving connectivity and delivering much-needed infrastructure in deprived areas.
- 1.22.19 Cultural and community infrastructure is also another important focus of the plan supported by Policy CL1. The IIA (paragraphs 6.169–6.188) highlights how this policy aims to provide accessible cultural facilities and promote a range of activities that reflect the Borough's diversity. The IIA highlights the role of these initiatives in fostering social cohesion, reducing social exclusion, and creating

platforms for mutual understanding and interaction between different demographic groups. By integrating cultural and community infrastructure into development, the policy supports placemaking objectives and contributes to Enfield's vision of inclusive growth.

Addressing systemic barriers

1.22.20 The IIA acknowledges that systemic barriers require targeted interventions to ensure equity. Improvements in east-west connectivity are recognised as a critical step in reducing isolation for disadvantaged communities, while the development of employment hubs and logistics sites addresses economic inequalities in deprived areas. These initiatives, combined with the policies outlined above, form a cohesive strategy for tackling structural barriers and advancing equality across the Borough.

Fostering Good Relations

1.22.21 The Enfield Local Plan places significant emphasis on fostering social cohesion by promoting inclusive developments, enhancing shared public spaces, and supporting cultural initiatives that celebrate diversity. Through its policies and regeneration efforts, the Plan aims to create environments where individuals from different backgrounds can interact, collaborate, and build mutual understanding. :

1.22.22 The Place-Making Policies outlined in the plan such as PL1 (Enfield Town) and PL3 (Edmonton Green) are central to these efforts. PL1 focuses on enhancing the town centre as a hub for residential, commercial, and cultural activities. The IIA (paragraphs 5.4–5.14) identifies Enfield Town as a key area for fostering inclusive growth, highlighting that planned public realm improvements and connectivity enhancements will encourage social interactions and create a more vibrant and welcoming environment. These developments aim to make Enfield Town an accessible space where individuals from diverse backgrounds can live, work, and engage with one another.

1.22.23 Similarly, PL3 addresses inequalities in the eastern part of the Borough through regeneration initiatives. The IIA (paragraphs 5.26–5.34) notes that the planned improvements at Edmonton Green aim to reduce spatial inequalities by integrating housing, employment, and infrastructure upgrades. These enhancements include better transport links and the provision of community and leisure spaces, which are designed to bring people together and promote greater social cohesion.

1.22.24 Cultural Policies particularly Policy CL1 play a crucial role in supporting activities and events that celebrate Enfield's diversity. The IIA (paragraphs 6.169–6.188) underscores the importance of accessible cultural facilities in fostering mutual understanding, reducing exclusion, and promoting community pride. By providing platforms for cultural exchange and collaboration, these policies strengthen Enfield's identity as an inclusive and welcoming Borough.

- 1.22.25 The Plan's focus on inclusive public spaces, as articulated in Policies DE1 and BG4, highlights the importance of creating environments that are accessible, safe, and welcoming to all residents. These policies advocate for high-quality design and the integration of green and blue infrastructure, fostering spaces that encourage social interaction, relaxation, and recreation.
- 1.22.26 The IIA (paragraphs 6.60–6.78) evaluates the design principles within Policy DE1. It highlights the policy's emphasis on step-free access, adaptable homes, and inclusive public spaces, which directly benefit individuals with disabilities, older residents, and families with young children. The IIA further notes that Policy DE1 contributes to reducing barriers to access and promotes inclusivity by embedding universal design principles into new developments. These measures ensure that public spaces are welcoming and usable by all demographic groups, thereby fostering greater social integration.
- 1.22.27 Similarly, the IIA (paragraphs 6.29–6.44) assesses the biodiversity and landscape restoration measures within Policy BG4. It identifies the policy's role in enhancing the Borough's green and blue networks, creating shared spaces that support mental and physical well-being. The IIA also highlights the positive impact of green spaces on fostering community cohesion, particularly in areas with limited access to recreational facilities. By prioritising urban greening, tree planting, and biodiversity net gain, Policy BG4 contributes to creating attractive, multifunctional public realms that are accessible and inclusive.
- 1.22.28 These policies collectively demonstrate the Plan's commitment to advancing equality and promoting good relations through the design and enhancement of inclusive public spaces. They align with the broader objectives of the Plan to foster social cohesion and improve quality of life across the Borough.

Conclusion

- 1.22.29 The Enfield Local Plan demonstrates clear and comprehensive compliance with the Public Sector Equality Duty under Section 149 of the Equality Act 2010 by integrating policies and strategies that eliminate discrimination, advance equality of opportunity, and foster good relations. Supported by a robust evidence base, including the IIA, the Plan provides a comprehensive framework for promoting equality and inclusivity across the Borough, ensuring that the needs of individuals with protected characteristics are met while fostering a cohesive, equitable community.
- 1.22.30 The Plan's inclusive approach is evidenced by its commitment to affordable housing (Policies H2 and H3), employment opportunities in deprived areas (Policies E1 and E2), and enhanced connectivity (Policies T1 and T2), ensuring access to opportunities for individuals with protected characteristics. Furthermore, place-making and regeneration policies, such as PL1 (Enfield Town) and PL3 (Edmonton Green), demonstrate a focus on creating vibrant, inclusive communities that reduce spatial inequalities and promote social cohesion.

- 1.22.31 Key initiatives, such as the integration of green and blue infrastructure (BG4) and the promotion of universal design principles (DE1), underline the Plan's commitment to fostering inclusive public spaces that enhance accessibility, safety, and well-being for all residents. The IIA provides detailed assessments (e.g., under chapters 5 and 6) that highlight how these policies collectively address systemic inequities and promote opportunities for interaction and mutual understanding across diverse demographic groups.
- 1.22.32 By aligning with national frameworks and responding to the specific needs of Enfield's diverse population, the Local Plan establishes a forward-thinking, evidence-based framework for sustainable and inclusive growth. It ensures that individuals with protected characteristics are not only accommodated but empowered, contributing to the Borough's vision of fostering a cohesive, equitable, and thriving community for all.

Superseded policies

Q1.23. Is the Plan consistent with Regulation 8(5) of the Town and Country Planning (Local Planning) (England)?

Response

1.23.1 As set out in the Council's response to PQ3, the Council is content that paragraph 1.15 of the ELP meets the requirements of Regulation 8(5). For ease of reference, Regulation 8(5) states –

“Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.”

1.23.2 ELP paragraph 1.15, as proposed to be modified, is clear that all of the policies and site allocations within the Core Strategy (2010), Development Management Document (2014), Edmonton Leaside Area Action Plan (2020), North East Enfield Area Action Plan (2016) and North Circular Area Action Plan (2014), will be superseded by the ELP policies and allocations, once the ELP is adopted.

Q1.24. Is the suggested main modification necessary to make the Plan sound and legally compliant?

1.24.1 In responding to PQ3, the Council proposed modifications to ELP paragraph 1.15, but did not state whether these were proposed Main Modifications or Additional Modifications.

1.24.2 The Council does consider that the proposed modifications to ELP paragraph 1.15 are necessary, to ensure the correct tense upon adoption of the ELP; to ensure clarity in terms of the fact that all of the policies and allocations in the previously adopted Local Plan are to be superseded upon adoption of the ELP; and to remove a duplicated sentence.

1.24.3 There is an element of judgement as to whether the proposed modifications constitute Main Modifications (being deemed necessary to make the Plan sound and legally compliant) or whether the changes are in fact Additional Modifications, as they do not materially affect the plan's policies (see Procedure Guide for Local Plan Examinations, updated 28th August 2024, paragraph 1.4). On balance, the Council considers the proposed modifications to be Additional Modifications but would welcome a steer from the Inspector.

Climate Change

Q1.25. Does the Plan accord with s19(1A) of the Planning and Compulsory Purchase Act 2004 by including policies that are designed to secure that the development and use of the land in the London Borough of Enfield contribute to the mitigation of, and adaptation to, climate change?

Response

1.25.1 Yes. The submitted Local Plan includes policies aimed at ensuring that land development and usage in the London Borough of Enfield contribute to both mitigating and adapting to climate change aligning with Section 19(1A) of the Planning and Compulsory Purchase Act 2004. The plan outlines strategies to reduce greenhouse gas emissions and enhance resilience to climate impacts, promoting sustainable development practices across the borough. Some policy examples include:

Policy SE2: Sustainable Design and Construction

1.25.2 This policy aims to ensure that all new developments are designed and constructed in a sustainable manner. This includes using environmentally friendly materials, incorporating energy-efficient designs, and minimizing waste during construction. The policy also encourages the use of renewable energy sources and sustainable building practices to reduce the environmental impact of new developments.

Policy SE3 Whole-life Carbon and Circular Economy

1.25.3 This policy aims to reduce carbon emissions throughout the lifecycle of buildings and infrastructure, promoting sustainable practices and materials. Key objectives include:

- Whole-life Carbon Assessment: Encouraging the assessment of carbon emissions from construction, operation, and demolition of buildings.
- Circular Economy Principles: Promoting the reuse and recycling of materials to minimize waste and reduce the environmental impact.
- Sustainable Building Practices: Encouraging the use of sustainable materials and construction methods to reduce carbon footprints.

Policy SE4: Reducing Energy Demand and Increasing Low Carbon Energy Supply

1.25.4 This policy aims to lower energy consumption and boost the use of low-carbon energy sources, by:

- Encouraging energy-efficient designs in new developments.
- Supporting the use of technologies that reduce energy demand.

- Promoting low-carbon energy generation, such as solar panels and heat pumps.
 - Ensuring new developments are resilient to future energy demands and climate impacts.
- 1.25.5 Policy SE5: Renewable Energy Development promotes the development and use of renewable energy sources within Enfield.
- 1.25.6 Policy T1: A Sustainable and Decarbonised Transport System aims to reduce carbon emissions and improve air quality through sustainable transport options.
- 1.25.7 Policy BG1: Blue and Green Infrastructure Network encourages the creation of an integrated and multi-functional network of green and blue infrastructure to support climate adaptation and biodiversity.
- 1.25.8 Policy BG2: Protecting Nature Conservation Sites focuses on preserving areas of ecological importance to maintain biodiversity and ecosystem services.
- 1.25.9 Overall, the ELP policies, through a range of measures and requirements, should ensure that development and use of land in the Borough contributes to the mitigation of, and adaptation to, climate change.

End of responses to Matter 1.