

**ENFIELD**  
*Council*



# **Enfield Local Plan (Regulation 24) 2024**

## **Stage 1 Matters, Issues and Questions**

**Matter 5: Key Diagram, Spatial Strategy and methodology  
for selection site allocations**

Wednesday 22 January 2025

**London Borough of Enfield**

## Matter 5: Key Diagram, Spatial Strategy and methodology for selecting site allocations.

Issue 5.1 Whether the vision and strategic objectives have been positively prepared and are justified and effective.

**Q5.1. Are the spatial vision and strategic objectives soundly based, justified by the evidence and is it clear how the Plan's policies will help to deliver the vision and strategic objectives over the Plan period?**

### Response

#### Part 1: Soundness and justification of the Vision and Strategic Objectives

- 5.1.1 The spatial vision and strategic objectives of the Enfield Local Plan (ELP) are soundly based, justified and proportionate to the Borough's unique challenges and opportunities. They provide a sustainable framework for growth by integrating housing, employment and infrastructure needs and environmental priorities, underpinned by robust evidence and extensive stakeholder engagement (as set out in the consultation statements including Regulation 22 [SUB12.1], and earlier plan making stages at Regulation 18 [REG2-3]. The vision reflects the principles of the National Planning Policy Framework (NPPF) and aligns with the London Plan's focus on achieving 'Good Growth'. By addressing disparities, promoting inclusive growth, and protecting Enfield's character, the plan balances local needs with regional and national priorities.
- 5.1.2 The vision was shaped through workshops, consultations and surveys with local residents, elected members, and key stakeholders. This collaborative process ensured alignment with community priorities, such as addressing housing affordability, supporting economic growth, improving east-west connectivity, and enhancing environmental sustainability. The resulting vision is locally distinctive, evidence driven and reflective of Enfield's diverse needs.
- 5.1.3 A robust evidence base underpins the vision and objectives ensuring alignment with the Borough's context and future demands:
- **Housing Needs:** The Local Housing Needs Assessment (LHNA) [HNE2] identifies a significant need for family-sized and affordable homes, with over 60% of housing demand focused on larger dwellings (paragraph 8.7). The Housing and Economic Land Availability Assessment (HELAA) [HOU1-HOU10] highlights capacity constraints on brownfield sites, necessitating complementary strategies such as selective Green Belt release.
  - **Employment Land:** The Employment Land Review (ELR) [EMP1] identifies a shortfall of 304,000 sqm of industrial and logistics floorspace and office floorspace of 40,000 sqm by 2041 (paragraph 8.15), driving policies to intensify and modernise existing employment areas.

- **Green Belt and Environment:** The Green Belt Assessment [GRE1-GRE13] and Blue and Green Infrastructure Strategy [FLD3] provide evidence for targeted Green Belt release and enhancements to biodiversity and green infrastructure.
- **Infrastructure:** The Infrastructure Delivery Plan (IDP) [IDP1-2] and Transport Assessment [TRA1] identify critical upgrades needed to support growth, including improved public transport, active travel infrastructure, and social amenities.
- **Integrated Impact Assessment (IIA):** The IIA [SUB8] evaluates the social, economic, and environmental impacts of the vision and strategic objectives, ensuring they address Enfield's needs sustainably.

5.1.4 The vision directly tackles disparities and challenges across the Borough:

- **Housing:** Policies H1-H3 address the acute need for diverse and affordable housing, ensuring delivery aligns with evidence from the LHNA and HELAA.
- **Employment and Economic Growth:** Policies E1, E2, and E5 respond to the ELR's findings, promoting industrial intensification and adaptable workspaces.
- **Connectivity and Infrastructure:** Policies T1-T3 focus on improving east-west links, reducing reliance on car travel, and supporting active travel, as identified in the Transport Assessment and IDP [IDP1-2].
- **Environmental Resilience:** Policies SE1, BG1, and BG10 align with the Blue and Green Strategy to enhance biodiversity, urban greening, and climate resilience.

5.1.5 The Council evaluated a range of reasonable alternatives, as detailed in the IIA [SUB8]. All of the strategic growth options and high-level policy options constituted reasonable alternatives and were subject to IIA. The results of LUC's appraisal of the reasonable alternatives considered in the 2018 Issues and Options are documented and presented in Appendix H of the IIA. Sole reliance on urban intensification was deemed insufficient to meet diverse housing needs, while an overreliance on Green Belt release risked environmental harm. The preferred strategy integrates elements of both, ensuring a balanced approach that minimises negative impacts and maximises opportunities for sustainable growth. The proposed policies have the potential to generate new significant positive changes for the Borough across the range of sustainability issues tested in the IIA process, as shown in the number of positive cumulative effects identified in Chapter 7 of the IIA.

5.1.6 The spatial vision and strategic objectives of the ELP are evidence-led, balanced, and aligned with local and regional priorities. They represent a sound and robust framework for sustainable growth that addresses housing and employment needs, infrastructure gaps, and environmental challenges while protecting Enfield's unique character.

## **Part 2: Delivery of the Vision through Policies**

5.1.7 The Local Plan demonstrates a clear and structured alignment between its policies and the overarching vision, ensuring effective delivery throughout the plan period. This alignment is systematically detailed in supporting tables within the appendices of this response:

- **Table 1** provides a concise summary linking the key elements of the vision to the relevant policies and the supporting evidence base.
- **Table 2** establishes connections between the Strategic Objectives, relevant policies, and the corresponding evidence, which indicates a robust and coherent framework for achieving the vision and addressing the Borough's specific needs.

5.1.8 By clearly mapping the vision to policies and evidence, the Local Plan outlines its commitment to a well-coordinated and deliverable strategy. This systematic approach ensures consistency, accountability, and focus throughout the plan period, enabling effective monitoring and adaptability as required.

### **Soundness and Justification**

5.1.9 The vision and strategic objectives are based in proportionate and robust evidence, including:

- The Integrated Impact Assessment (IIA), which evaluates the social, economic, and environmental implications of policies.
- Housing and Economic Land Availability Assessment (HELAA), identifying land supply constraints and potential.
- Employment Land Review (ELR), highlighting shortfalls in industrial and logistics floorspace and informing policies for intensification and diversification.
- Green Belt Assessment, justifying selective Green Belt release to address housing and employment needs and
- Infrastructure Delivery Plan (IDP), which identifies critical upgrades in transport, utilities, and community infrastructure to support growth.

5.1.10 The vision reflects the overarching principles of sustainable development by integrating social, economic, and environmental objectives. It prioritises addressing inequalities, such as the east-west disparity in housing and infrastructure, supporting health and well-being through active travel and cohesive neighbourhoods, and tackling climate change through carbon reduction and biodiversity enhancements.

### **Addressing key objectives**

5.1.11 The Plan's policies provide a clear and effective mechanism for delivering the vision and objectives. Key policy areas demonstrate this alignment:

- **Housing Needs:** Policies H1, H2, and H3 are informed by the LHNA and HELAA, ensuring delivery of family-sized and affordable housing.
- **Employment Growth:** Policies E1, E2, and E5 address the ELR's findings by promoting industrial intensification and adaptable workspaces.
- **Infrastructure:** Policies T1, D1, and SC1 are aligned with the IDP, addressing connectivity gaps and supporting active travel.
- **Environmental Goals:** Policies SE1, BG3, and BG4 reflect the Blue and Green Strategy, enhancing biodiversity, climate resilience, and the blue-green infrastructure network.

5.1.12 The vision integrates social, economic, and environmental priorities, addressing inequalities such as the east-west disparity in housing and infrastructure, promoting health and well-being through cohesive neighbourhoods and active travel, and mitigating climate change through carbon reduction and biodiversity initiatives.

### **Deliverability through policies**

5.1.13 The Plan's policies provide a clear mechanism for translating the vision into actionable outcomes, as demonstrated in the following key areas:

- **Housing:** Policies H1, H2, and H3 address local housing needs, ensuring delivery of affordable, family-sized, and diverse homes, aligned with evidence from the LHNA and HELAA.
- **Employment and Economy:** Policies E1, E2, and E5 support industrial intensification, logistics hubs, and diverse workspaces, responding directly to the ELR.
- **Infrastructure and Connectivity:** Policies T1, D1, and SC1 enhance transport networks, public realm, and social infrastructure, aligning with the IDP and Transport Assessment to bridge connectivity gaps and promote active travel.
- **Environment and Climate Resilience:** Policies SE1, BG3, and BG4 focus on climate resilience, biodiversity, and blue-green infrastructure, supported by the Flood Risk Assessments, Blue and Green Strategy, and Carbon Reduction Strategy.
- **Heritage and Culture:** Policies DE4 and CL1 protect and enhance heritage assets while supporting cultural and creative industries, as outlined in the Heritage Strategy and Cultural Strategy.
- **Town Centres and Place-Making:** Policies TC1 and TC2 promote vibrant, multifunctional town centres, informed by the Town Centre Needs Assessment and Healthy Streets Approach.
- **Rural Areas:** Policy RE2 balances rural conservation with economic contributions, as evidenced in the Rural Land Study and IIA.

## Integration and Balance

- 5.1.14 The Local Plan achieves a careful balance between competing priorities, such as urban intensification and Green Belt release, ensuring that growth is both sustainable and locally appropriate. The IIA demonstrates how trade-offs have been managed to address housing and employment needs while safeguarding environmental quality and the Borough's character.

## Conclusion

- 5.1.15 The Local Plan's policies are clearly aligned with its vision and strategic objectives, providing a robust, evidence-based framework for sustainable growth. By addressing key challenges and opportunities in a balanced manner, the Plan ensures effective delivery of Enfield's vision for a vibrant, inclusive, and resilient Borough.

## Issue 5.2: Whether Policy SS1 establishes an appropriate spatial strategy, taking into account reasonable alternatives.

- Q5.2. Is the spatial strategy for the scale and distribution of growth, set out in Policy SS1, justified and appropriate for the sustainable development of the area when considered against reasonable alternatives? What reasonable alternatives were considered by the Council and why were these rejected?**

## Response

- 5.2.1 The Council's Spatial Strategy as articulated in Policy SS1, prioritises sustainable growth by integrating economic, social and environmental objectives in accordance with the overarching principles of the National Planning Policy Framework (NPPF). The strategy ensures development is planned holistically, addressing pressing housing and employment land needs with the imperative to protect and enhance its natural and built environment. Policy SS1 focuses on: growth in regeneration areas, Opportunity Areas for example Meridian Water, New Southgate and town centres, the use of previously developed sites, and selective Green Belt releases justified by exceptional circumstances. This integrated approach aligns with national objectives and the London Plan's principles of 'good growth' promoting inclusive communities, optimising land use, and delivering high quality housing and employment opportunities.
- 5.2.2 The approach reflects the NPPF's emphasis on sustainable development as outlined in paragraphs 8 and 11, ensuring growth improves environmental quality, meets social needs for diverse and affordable housing, and supports economic prosperity. The Spatial Strategy is underpinned by a comprehensive evidence-based/decision-making, as demonstrated in the Housing and Economic Land Availability Assessment (HELAA), the Employment Land Review (ELR), and the Integrated Impact Assessment (IIA). These assessments provided robust insights into Enfield's capacity for development, identified constraints, and informed the selection of sites to ensure that growth is deliverable, resilient and aligned with strategic infrastructure enhancements.

5.2.3 This integrated vision for growth not only addresses Enfield's local challenges but also supports regional objectives outlined in the London Plan, as such fostering inclusive communities, optimising land use, and delivering 'good growth'. By combining urban regeneration with carefully planned Green Belt releases, the strategy outlines a proactive, innovative approach to creating a sustainable future for the Borough while adhering to national and regional planning principles.

### **Evidence Base Supporting the Strategy**

5.2.4 In line with the Planning Practice Guidance, the Council prepared a comprehensive evidence base to assess future needs, constraints and opportunities. This includes:

- Housing and Economic Land Availability Assessment (HELAA) [HOU1-HOU10], demonstrates land capacity and constraints for housing delivery.
- Employment Land Review (ELR) [EMP1], quantifies employment land needs, identifying significant shortfalls without Green Belt release.
- Integrated Impact Assessment (IIA) [SUB8], evaluates the sustainability of alternatives.
- Flood Risk Assessments [FLD1-FLD14].
- Transport Assessment [TRA1].
- Green Belt Assessment [GRE1-GRE13], identifies parcels of land suitable for release, ensuring minimal harm to Green Belt objectives.
- Duty to Cooperate Statement with Statements of Common Ground [SUB14], confirms engagement with neighbouring authorities to explore unmet need.

5.2.5 These assessments identified the key issues and challenges, such as housing shortage, employment land demands, and infrastructure needs (see response to MIQ Q1.6 for further information). This evidence informed the preparation of the Local Plan, ensuring that identified constraints were effectively addressed to facilitate sustainable growth across the Borough.

5.2.6 The Spatial Strategy aligns with paragraph 11 of the NPPF, ensuring sustainable patterns of development that meet the development needs of the area while aligning with infrastructure delivery, enhance environmental quality and adapt to the impacts of climate change, while balancing growth and protection of Enfield's character. The Council's approach aligns closely with these principles, as further reinforced by the policies of the London Plan.

5.2.7 The Integrated Impact Assessment (IIA) played a pivotal role in evaluating reasonable alternatives. It rigorously explored the social, economic, and environmental impacts of various growth strategies, providing evidence that shaped the direction of the spatial strategy.

## Growth Needs and Challenges

- 5.2.8 The Borough faces significant housing and employment land needs, which are critical considerations for sustainable development. Enfield has already utilised the majority of its brownfield sites to accommodate housing, leaving limited options for further development without looking beyond urban intensification. Evidence from the Housing Topic Paper (2024) [TOP3] and the Housing and Economic Land Availability Assessment (HELAA) [HOU1-HOU10] highlights that while brownfield sites and windfall opportunities have contributed significantly to housing delivery to date, their capacity is limited. Projections indicate a sharp decline in housing delivery post-2029 unless additional sites, including Green Belt locations, are considered. The Site Allocation Topic Paper (2024) [TOP2] further notes that reliance solely on urban intensification and brownfield sites risks delaying delivery and impacting viability due to site constraints and competing land uses.
- 5.2.9 The key points are addressed in more detail below, based on the following pieces of evidence:
- **Housing needs:** Enfield is required by the London Plan (2019-2029) to deliver 12,460 homes equating to 1,246 homes per annum, over the ten-year period. The Standard Method for calculating housing need projects an even higher requirement of 64,789 homes between 2021-2041.
  - **Housing Mix:** The Enfield Local Housing Needs Assessment (LHNA) [HNE2] identifies a predominant need for larger homes, with over 60% of the need focused on three- and four-bedroom properties. This contrasts sharply with the recent completions, where nearly 75% of new homes delivered between 2019/20 and 2021/22 were smaller, one- or two-bedroom dwellings.
  - **Affordable Housing:** The LHNA [HNE2], also highlights a substantial need for affordable housing, with over 700 social or affordable rented homes and nearly 700 intermediate homes required annually. Currently delivery falls significantly short of these figures, recognising the widening gap between need and provision.
  - **Employment Land:** The Employment Land Review (ELR) [EMP1] identifies a need for 306,000 sqm of additional industrial and warehousing floorspace by 2041. This is essential to support local economic growth and meet the NPPF requirement for Councils to plan positively and realistically for employment needs.
- 5.2.10 Other development needs include essential community and physical infrastructure, such as recreational facilities, transport infrastructure, and educational provisions, which are crucial to supporting sustainable growth and maintaining a high quality of life for residents.
- 5.2.11 The London Plan also highlights a significant unmet housing need across London of 13,000 dwellings per annum for the 2019-2029 period, as identified by the Examination Panel. This wider shortfall emphasises the



importance of Enfield's Local Plan in addressing both local and regional housing challenges.

5.2.12 In accordance with the principles of 'good growth' as outlined in the London Plan and the NPPF, the Local Plan aims to deliver development that is:

- Socially inclusive, addressing the need for a diverse range of housing types and tenure.
- Economically viable, creating opportunities for local employment and business growth.
- Environmentally sustainable, ensuring that the growth is aligned with infrastructure improvements and environmental preservation.

5.2.13 Meeting these needs requires a strategic approach that balances housing delivery, employment land provision, and infrastructure enhancements while minimising negative impacts on the Borough's character and environment.

### **Assessment of Reasonable Alternatives**

5.2.14 To identify potential solutions to help, resolve and/ or improve these constraints, the Council consulted on seven spatial options (reasonable alternatives) for the scale and distribution of growth within the Issues and Options Consultation 2018 (Regulation 18) [REG1]. These options are detailed in the Council's response to Q1.16.

5.2.15 All options were assessed within the Council's Integrated Impact Assessment (IIA) (see Chapter 4, paragraphs 2.24-2.25 and Appendix H of the IIA [SUB8]). All identified spatial options were considered against the sustainability objectives within the IIA report. The IIA process explores the likely social, economic and environmental impacts of accommodating different levels and distributions of development within the Borough. It also considers the scope for mitigating any identified potential adverse impacts.

### **Seven broad spatial growth options**

5.2.16 The Council considered seven broad spatial growth options in the 2018 Issues and Options to determine the most appropriate approach for distributing housing and employment development across the Borough. Each option was evaluated through the IIA, which assessed their social, economic and environmental sustainability. The IIA [SUB8] explains at Appendix H, paragraph H.18, that the spatial distribution options were not mutually exclusive, and that individually they would not be able to deliver the overall growth required for the Borough. Choices would therefore need to be made about which elements of these options would be taken forward to form the spatial strategy in the ELP.

#### **Option 1: Main town centres and areas around all stations**

5.2.17 This option focused on directing growth to main town centres and areas around all stations leveraging accessibility, existing transport links and opportunities for mixed use developments. While this approach maximised

the use of previously developed land and supported economic vitality, it faced significant constraints in addressing the Borough's need for family-sized housing see (IIA [SUB8], Appendix H, paragraph H.23). Additionally, the limited capacity of these areas risked overburdening local infrastructure (see IIA [SUB8], Appendix H, paragraph H.24). As such, as a standalone option was rejected as it could not meet the Borough's full range of housing needs.

### **Option 2: Strategic transport corridors**

- 5.2.18 This option concentrated growth along strategic transport corridors, aiming to promote public transport use and align development with existing or planned infrastructure. While this approach aligned with the sustainability goals, the IIA highlighted significant infrastructure limitations, which posed challenges for comprehensive development and constrained the delivery of a mix housing types required to meet local needs (Chapter 4 and Appendix H of the IIA). Consequently, this option was also rejected due to its inability to fully address local needs within the existing transport network's capacity.

### **Option 3: Existing estate renewal and regeneration programmes**

- 5.2.19 This option prioritised estate renewal and regeneration programmes to deliver housing and infrastructure improvements, while maximising the use of previously developed land. Although this approach enhanced community environments and addressed some housing needs, the IIA identified its limited capacity to meet overall housing and employment needs. Regeneration alone could not accommodate the demand for family-sized homes and employment land without complementary strategies (Chapter 4 and Appendix H of the IIA). Therefore, this option was deemed insufficient capacity as a standalone approach.

### **Option 4: Eastern Corridor and the Industrial Areas**

- 5.2.20 This option explored significant redevelopment and regeneration in low-density industrial areas and the Eastern corridor. This option offered strategic potential for growth but presented challenges in balancing redevelopment with maintaining the industrial capacity necessary for the local economy. Additionally, comprehensive upgrades to transport, utilities, and social infrastructure were required to make these areas viable for mixed-use developments. Without such enhancements, the Eastern Corridor's potential for sustainable growth could not be fully realised (Chapter 4 and Appendix H of the IIA). Given these challenges, this option was rejected as a primary strategy.

### **Option 5: Future Crossrail 2 Growth Corridor**

- 5.2.21 This option sought to harness anticipated connectivity enhancements from the proposed Crossrail 2 infrastructure to support significant housing and employment growth. However, uncertainties surrounding the timing and delivery of Crossrail 2 infrastructure posed difficulties in aligning planned developments with the expected improvements in connectivity. Moreover, the need for substantial upfront infrastructure investment further complicated

the feasibility of this option as set out in Chapter 4 and Appendix H. As a result, this option was rejected due to its reliance on uncertain future infrastructure delivery.

### **Option 6: The New Southgate and Upper Lee Valley Opportunity Areas**

- 5.2.22 This option concentrated development within the New Southgate and Upper Lee Valley Opportunity Areas, which are strategically designated in the London Plan. These areas offered significant potential for housing and employment growth by focusing on previously developed underutilised or brownfield land. However, the IIA concludes that these areas alone could not meet the scale of housing and employment needs required for the Borough. Complementary strategies, such as selective Green Belt release, were necessary to address the shortfall (Chapter 4 and Appendix H). For this reason, this option not selected as a standalone strategy.

### **Option 7: Strategic Plan-led approach to Green Belt**

- 5.2.23 This final option involved a strategic, plan-led approach to selective Green Belt release, justified by exceptional circumstances and adopted only after exhausting all other reasonable alternatives. The Green Belt Assessment and IIA (conducted in 2021 and 2023) [GRE1-13] identified specific parcels of land that aligned with sustainability goals while minimising ecological impact and visual harm. This approach enabled the Council to address critical housing and employment needs while ensuring compliance with the NPPF's requirement for exceptional circumstances and only after demonstrating that all other reasonable options have been exhausted. Engagement with neighbouring boroughs through the Duty to Cooperate [SUB14a] confirmed that they were unable to accommodate Enfield's unmet needs, further justifying this approach. The selective Green Belt release, in combination with elements of the other spatial strategy options, was ultimately chosen as it provided the necessary scale of development to meet the Borough's pressing needs while delivering infrastructure, green space, and community benefits. It also supports the mixed approach required for sustainable growth over the plan period (Chapter 4 and Appendix H). As this option combined with elements of the other spatial strategy options, provided the necessary scale of housing and employment development to meet the Borough's needs while maintaining compliance with the NPPF, it was ultimately selected as the most appropriate and sustainable approach.

## **Evaluation of Options**

- 5.2.24 The evaluation of these seven spatial growth options through the IIA demonstrated that no single option could independently address Enfield's housing, employment, and infrastructure challenges. While each option offered benefits, they also presented limitations that made them insufficient to deliver the scale and diversity of growth required to meet the Borough's needs comprehensively.
- 5.2.25 Recognising this, the Council adopted a hybrid approach in Policy SS1, integrating elements of the most sustainable options. This approach combines regeneration of previously developed sites, development within

Opportunity Areas, and selective Green Belt release. This balanced strategy ensures that growth is distributed in a manner that aligns with sustainability objectives while addressing housing and employment needs comprehensively. Detailed analysis of this hybrid approach is provided in the IIA (Chapter 4 and Appendix H).

- 5.2.26 The IIA emphasised the importance of locating new development in areas with existing sustainable transport options, or locations where opportunities exist for enhanced connectivity. However, the IIA also identified significant challenges in delivering the range of housing types needed, if the strategy relied solely on urban intensification. Urban areas predominately deliver smaller one and two-bedroom dwellings, which do not address the Borough's need for larger family and affordable homes. This issue is outlined in table 2.1 (pages 14-15) and the last column of Table 2.2 (pages 17-18) in the IIA [SUB8], which detail the Council's rationale for discounting certain options and highlight the trade-offs necessary to achieve a sustainable strategy.
- 5.2.27 The IIA also evaluated the implications of limiting development to existing urban areas. It concluded that this approach would fall significantly short of meeting local housing needs, particularly for family-sized and affordable housing. Additionally, substantial urban growth would result in significant negative impacts on the Borough's character and environment, which could not be justified. The assessment further revealed that such restrictions would leave employment land needs unmet, adversely impacting local economic growth. These findings are detailed in the assessment of reasonable alternatives in Chapter 4 and Appendix H of the IIA, where the social, economic, and environmental impacts of urban-only development are thoroughly examined.
- 5.2.28 Given these limitations, the Council considered the selective release of Green Belt land as a necessary component of its spatial strategy. The Green Belt Assessment (2021 and 2023) [GRE1–GRE13] evaluated parcels of land against the purposes set out in the NPPF, identifying sites that could be released with minimal harm to Green Belt objectives. These findings, combined with the IIA (Chapter 4 and Appendix H), informed the site selection process. The Site Allocations Topic Paper [TOP2], Section 3.5, outlines how these evidence bases were utilised in determining appropriate sites for development. Importantly, Green Belt release was pursued only as a last resort after formal requests to neighbouring boroughs through the Duty to Cooperate Statement [DTC2] Appendix B confirmed that no neighbouring authority was able to accommodate Enfield's unmet needs.
- 5.2.29 The evaluation of the seven options through the IIA reinforced that a hybrid approach, as outlined in Policy SS1, was the only viable and sustainable solution. This approach integrates regeneration of previously developed sites, development within Opportunity Areas, and selective Green Belt release to deliver the Borough's growth requirements comprehensively. This strategy ensures alignment with national and regional objectives while effectively addressing local challenges.

5.2.30 The hybrid approach adopted in Policy SS1 is reflected in the Council's Publication Draft of the Local Plan Consultation [SUB02]. This strategy balances the Borough's pressing need for housing and employment land with the imperative to protect and enhance its natural and built environment. The resulting development framework represents a sound and justified response to the complex challenges facing Enfield, ensuring that future growth benefits residents and stakeholders while safeguarding the Borough's unique character and sustainability goals.

### **Justification for Policy SS1**

5.2.31 Policy SS1: Spatial Strategy adopts a balanced and evidence-based approach to achieving sustainable growth in Enfield. Drawing from the assessed options, it integrates key components that align with the principles of sustainable development and address the Borough's unique challenges:

- 1) **Regeneration of previously developed sites and Opportunity Areas:** Policy SS1 prioritises targeted redevelopment in areas such as the Lee Valley and New Southgate, which are identified as Opportunity Areas in the London Plan. These locations leverage existing infrastructure and connectivity, ensuring the effective use of underutilised land while delivering much-needed housing and employment opportunities.
- 2) **High quality development in Town Centres:** by focusing growth in town centres with good transport links, Policy SS1 ensures alignment with existing infrastructure capacity. This approach supports economic vitality, strengthens local communities, and fosters cohesive, well integrated environments.
- 3) **Selective Green Belt release:** recognising the critical housing and employment land shortfall, Policy SS1 incorporates limited Green Belt release as a necessary measure of last resort. This approach is supported by the Exceptional Circumstances Topic Paper [TOP1], which demonstrates compliance with the NPPF requirements for justifying Green Belt release.

5.2.32 This balanced approach reflects the NPPF and the London Plan's principles of 'good growth' ensuring that development promotes social inclusivity, economic viability and environmental sustainability. It prioritises sustainable development patterns while addressing pressing housing, employment and infrastructure needs.

### **Exceptional Circumstances and Duty to Cooperate**

5.2.33 The Council has demonstrated exceptional circumstances for limited Green Belt release, as required by paragraph 137 of the NPPF. This approach was pursued only after exhausting all other reasonable alternatives, including urban intensification and formal engagement with neighbouring authorities through the Duty to Cooperate [DTC2]. Despite these efforts, the DtC process confirmed that no neighbouring borough could accommodate Enfield's unmet housing and employment needs, necessitating a local solution.

5.2.34 The identification of Green Belt sites for release was guided by comprehensive assessments, including the Green Belt Assessment [GRE1 to GRE13] and the IIA [SUB8]. These evaluations ensured that selected sites would cause minimal environmental harm to Green Belt objectives while aligning with strategic growth priorities. This approach balances the urgent need for housing and employment land with the protection of Enfield's natural and built environment, maintaining compliance with national planning policies.

## Conclusions

5.2.35 Policy SS1 is justified, robust, appropriate and aligning with national and regional policy requirements. By integrating urban regeneration, development within Opportunity Areas, and selective Green Belt release, it delivers a sustainable spatial strategy that effectively addresses pressing housing and employment needs while protecting Enfield's character and environmental assets.

5.2.36 The approach ensures:

- Improved housing delivery across a diverse range of needs, including family-sized and affordable homes.
- Economic growth through the provision of industrial and employment land to support local prosperity.
- Environmental preservation by prioritising strategic site selection and mitigation measures to minimise harm.

5.2.37 Policy SS1 represents a well-balanced and forward-looking strategy that meets current and future challenges. It supports Enfield's long-term development vision, providing a comprehensive framework for sustainable growth that benefits both residents and the wider community.

**Q5.3. Other than those specifically referred to in Policy SS1 (ie PL5, PL6, PL10, PL11 and New Southgate (PL7)) is it clear how the 'place making' areas relate to the overall spatial strategy and the purpose they serve in delivering the overall strategy?**

## Response

5.3.1 Policy SS1 establishes a robust framework for sustainable growth and regeneration in Enfield, aligning closely with the principles of the London Plan, particularly its emphasis on 'Good Growth'. The policy addresses critical housing needs, supports economic development, and enhances environmental sustainability, through three key pillars:

- Regeneration of Previously Developed Land:** Making efficient use of brownfield sites, consistent with the London Plan's objective of optimising development on underutilised urban land.
- Development in London Plan Opportunity Areas:** Targeting Meridian Water and New Southgate, designated as Opportunity Areas in the

London Plan, as focal points for delivering significant housing and employment growth. These areas benefit from existing and planned transport infrastructure, enabling higher-density, mixed-use development.

- c) **Urban Extension at Chase Park and a new settlement at Crews Hill:** Providing for long-term growth through urban extensions, these areas are integral to addressing Enfield's acute housing and employment needs. They incorporate mixed-use developments with infrastructure enhancements and green space integration, aligning with the NPPF's exceptional circumstances requirement.

5.3.2 The urban extension at Chase Park and new settlement at Crews Hill align with the NPPF, and in the Council's views, also conform to the London Plan. While the Greater London Authority (GLA) has raised objections, particularly regarding the proposals' consistency with the London Plan's focus on public transport accessibility and its Good Growth principles, Enfield's evidence base provides a robust justification. The Green Belt **Exceptional Circumstances Topic Paper** [TOP5] and the **Conformity Topic Paper** [E3.2] demonstrates the critical need for these developments to address the Borough's acute housing and employment needs.

5.3.3 The **Conformity Topic Paper** highlights the Borough's unique constraints, including limited development capacity within existing urban areas and the imperative to meet significant housing targets, which necessitate the consideration of Green Belt land under exceptional circumstances. To address concerns about accessibility for compliance with Good Growth principles, the Conformity Topic Paper outlines planned infrastructure improvements, such as enhanced transport links and active travel networks, which will progressively align these developments with London Plan objectives. These proposals represent a last-resort solution, following a comprehensive examination of all reasonable alternatives, in accordance with the NPPF's requirement to exhaust all reasonable options before considering Green Belt release.

### **Placemaking areas and their contribution to Policy SS1**

5.3.4 Placemaking areas are central for implementing the spatial strategy outlined in Policy SS1. Beyond the explicitly identified areas (PL5, PL6, PL7, PL10 and PL11), the other placemaking areas including PL1 Enfield Town, PL2 Southbury, PL4 Angel Edmonton, PL8 Palmers Green, also play a significant role in delivering the overarching strategy by focusing growth and regeneration in specific locations. The Plan establishes their contributions to housing, employment, infrastructure delivery and environmental enhancement ensuring a balanced approach towards efficient land use, sustainable development, and community enhancement. These areas are supported by the IIA, which demonstrates their role in balancing housing and employment needs with environmental and infrastructure improvements (Chapter 4).

## **Transformative Opportunities at Meridian Water and New Southgate**

5.3.5 Meridian Water (PL5) and New Southgate (PL7), as London Plan Opportunity Areas, represent transformative development opportunities. These areas are key to delivering a significant proportion of the Borough's housing and employment needs. Policy SS1 highlights Meridian Water as the largest previously developed site in Enfield, capable of delivering mixed-use regeneration with high-frequency sustainable transport links. Similarly, New Southgate, shared with neighbouring boroughs Barnet and Haringey, offers opportunities for urban intensification and cross-boundary collaboration, aligning with the London Plan's objectives and reflecting Enfield's spatial strategy goals of leveraging well-connected sites for growth.

## **Urban extension at Chase Park and a New Settlement at Crews Hill**

5.3.6 Chase Park (PL10) and Crews Hill (PL11) serve as urban extensions that address long-term housing needs while enhancing green infrastructure. These areas exemplify the balance between growth and environmental sustainability. Policy SS1 requires the preparation of masterplans to ensure that development in these areas is coordinated and supported by necessary infrastructure, as emphasised in the Green Belt Exceptional Circumstances Topic Paper [TOP5], which supports these urban extensions as critical to delivering the spatial strategy. These developments will contribute to the Borough's housing supply while integrating green spaces and landscape restoration.

## **Other Place-Making Areas and Their Role in the Spatial Strategy**

5.3.7 Beyond the areas explicitly highlighted in the Inspector's question, the remaining place-making areas include Enfield Town (PL1), Edmonton Green (PL3), Angel Edmonton (PL4), Southgate (PL6), and Palmers Green (PL8) align with the spatial strategy by strengthening town centres as hubs for sustainable, high-quality growth. These areas are integral to:

- **Housing Delivery:** These centres contribute to meeting housing needs through urban intensification, as outlined in Policies H1–H3. This aligns with the Plan's objectives to optimise land use in accessible locations.
- **Employment and Economic Activity:** They provide opportunities for mixed-use development, including retail, commercial, and cultural spaces, fostering local economies and job creation, as indicated in Policies E1–E3.
- **Connectivity:** By concentrating development in well-connected locations, these centres enhance access to public transport and active travel options, reducing car dependency, as supported by Policies T1–T2.
- **Community and Cultural Enrichment:** These areas also provide spaces for cultural and social activities, contributing to Enfield's goal of fostering cohesive and vibrant communities, as reflected in Policies SC1 and CL1.



## **Town centres as economic and social hubs**

5.3.8 The town centres identified in Policy SS1, including Enfield Town (PL1), Edmonton Green (PL3), Palmers Green (PL8), Southgate (PL6), and Angel Edmonton (PL4), play a pivotal role in the spatial strategy. They are designated as hubs for high-quality growth, combining residential, commercial, and community uses with enhanced public realm. These centres align with the principles of sustainable development by promoting active travel, supporting local economies, and acting as focal points in the Borough's blue-green infrastructure network, as supported by the IIA (Appendix H).

## **Environmental Integration and Sustainability**

5.3.9 The place-making areas contribute significantly to Enfield's commitment to climate resilience and biodiversity. Policy SS1 prioritises integrating green and blue infrastructure into these areas, enhancing public access to green spaces. The IIA identifies the importance of linking growth with sustainable transport and green spaces to mitigate environmental impacts and improve quality of life.

## **Alignment with the Integrated Impact Assessment (IIA)**

5.3.10 The IIA confirms that the spatial strategy is sustainable and balanced. It evaluates the social, economic, and environmental impacts of the place-making areas, demonstrating how they contribute to the Borough's housing and employment goals while safeguarding environmental and community well-being. Specifically, the IIA highlights the importance of concentrating growth in accessible locations and leveraging brownfield regeneration to address inequality and improve infrastructure, aligning with the broader place-making approach.

## **Clarity in the Plan and Suggested Modifications**

5.3.11 The Local Plan clearly defines the role of place-making areas in delivering the spatial strategy. Chapter 3 of the Plan provides detailed descriptions of these areas, linking their development objectives to broader Borough-wide goals. For instance:

- **Enfield Town (PL1)** is identified as a key site for housing and economic activity, with improvements to its public realm and transport links.
- **Edmonton Green (PL3)** and **Angel Edmonton (PL4)** are targeted for regeneration to address inequality and boost economic growth in the east of the Borough.
- **Southgate (PL6)** and **Palmers Green (PL8)** focus on mixed-use development, enhancing local amenities and connectivity.

5.3.12 To further improve the Plan's clarity, the Council is recommending that the role of all place-making areas be explicitly reflected in Policy SS1 as part of the modifications schedule [E6]. This would ensure that the contribution of these areas to the spatial strategy is unambiguously stated.

## Correction to Policy SS1

- 5.3.13 An editing error has been identified in Part 6 of Policy SS1, where Southbury is incorrectly referred to as PL6 instead of PL2. This correction will be set out in the Modifications Schedule [E6] to ensure clarity and accuracy in the policy.

## Conclusion

- 5.3.14 The place-making areas are integral to delivering the objectives of Policy SS1 and the overall spatial strategy. They provide a coherent framework for growth, regeneration, and sustainability, addressing housing, employment, and infrastructure needs while enhancing environmental and social outcomes. This approach reflects a balanced and evidence-based strategy that aligns with Enfield's vision for sustainable development.

## Strategic Approach to Minimising Flood Risk

- Q5.4. Is the spatial strategy consistent with national policy on flood risk? Has the Plan been informed by a Strategic Flood Risk Assessment based on the most up-to date flood risk data and climate change allowances and taking advice from the Environment Agency?**

## Response

- 5.4.1 The Council considers the approach taken by Policies SS1, SE7 and Policy SE9 (which specifically relate to Flood Risk) is consistent with paragraph 8, objective (c) of the NPPF. In addition, paragraph 20 (b) '*Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for: infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)*'; the NPPF requires authorities to adopt proactive policies to adapt to climate change and reduce the risk from flooding.
- 5.4.2 Policy SE7 has also followed the approach set out in the Flood Risk and Coastal Change PPG (2022), particularly the guidance within taking Flood Risk into account when preparing plans and producing strategic policies. This includes following the requirement to produce a Level 1 Strategic Flood Risk Assessment 2021 [FLD5], a Level 2 Strategic Flood Risk Assessment 2023 [FLD1] and use it to inform the IIA [SUB8] and site selection process.
- 5.4.3 Part 4 of the Policy aligns with the provisions of Flood Risk and Coastal Change PPG Paragraph: 011 which asks that plans consider including in their policies mechanisms to discourage development that could prevent or hinder the delivery of planned flood risk management associated infrastructure.
- 5.4.4 Policy SE7 is considered to be sufficiently flexible to allow for issues to be overcome that are unknown at the time of plan preparation; the use of a Flood Risk Assessment (within Part 1) at planning application stage will

ensure development is protected from flood risk and does not increase or exacerbate flood risk elsewhere.

- 5.4.5 Paragraph 166 of the NPPF states that Local Plans should be accompanied by a Strategic Flood Risk Assessment (SFRA) to demonstrate how flood risk will be managed over the lifetime of the development, taking climate change into account. As such, Policy SE7 has been informed by the Enfield Strategic Flood Risk Assessment (SFRA) Level 1 [FLD4] and the SFRA Level 2 [FLD4].
- 5.4.6 The SFRA Level 1 [FLD4] classifies all land within the Borough into one of four Flood Zones and make an allowance for climate change. Although there are areas of the Borough that are vulnerable to fluvial flooding, in general there is only a limited number of locations where development is currently proposed that are within higher risk flood areas. Most of the growth has been located within less vulnerable areas. This has largely been reflected by the locations for growth within the Local Plan, which have been appraised in more detail through the SFRA Level 2 [FLD1]. There are a few exceptional cases, where for clear sustainability, infrastructure and regeneration reasons, land is proposed for allocation in a flood zone such, for example, sites SA11.1 and SA11.2 for their contribution towards delivering new homes and infrastructure and sites SA3.3 and SA8.3 for delivering economic regeneration.

**Q5.5. Can the Council demonstrate that the Plan takes a sequential, risk-based approach to the location of development, so as to avoid where possible flood risk to people and property?**

**Response**

- 5.5.1 Paragraph 167 of the NPPF states that Local Plans should apply a sequential, risk based approach to the location of development in relation to the risk from flooding. On this basis, the Council prepared a Sequential Test and Exceptions Test Topic Paper [E7.6] as part of the L2 SFRA [FLD1]. The Topic Paper [E7.6] demonstrates that most allocated land identified within the Plan falls outside areas or are only very limited parts of sites are affected by the highest risk from flooding. Where flood risk is identified, there are detailed mitigation measures that would enable development to take place in those locations in accordance with paragraph 8 of the NPPF.
- 5.5.2 At Regulation 19, the Environment Agency raised concern about the integrated approach to the Sequential Test. The Council has accepted that the conclusions of the SFRA Level 2 were incorrectly formulated. However, this does not affect the underlying work or the conclusions which could be drawn in relation to overall compliance with policy. In response, the Council has prepared a separate STR using the data and information identified within the L2 SFRA to improve clarity.
- 5.5.3 Both the Level 2 SFRA and the supporting Topic Paper [E7.6] have been agreed as appropriate evidence with the Environment Agency. This is set out within the draft SoCG with the EA dated January 2025 [SUB14g]. It is

anticipated that) [SUB14g] which forms part of this statement will be signed in the coming days.

**Q5.6. Is the Plan consistent with the actions set out in paragraph 167a)-d) of the NPPF, namely applying the sequential test, safeguarding land from development that is required, or likely to be required for current or future flood management, using opportunities provided by new development to reduce the causes and impacts of flooding and demonstrating how changes to flood risk arising from climate change have been taken into account?**

### **Response**

5.6.1 The Plan has applied a sequential approach to the location and distribution of growth by allocating most of the growth in areas outside of areas at a high risk from flooding. 42 proposed sites are located or only partly located within areas at risk from flooding. The Council's Level 2 Strategic Flood Risk Assessment [also provides recommendations for those locations within or close to an area at risk of flooding. In addition, site specific flood risk assessments documents SFL1-SF109 have been prepared to inform the type of risk, the location, the land-use and required mitigation measures required for allocation.

5.6.2 Table 2 of the Topic Paper [E7.6] [E7.8] sets out the sites which passed the Sequential Test. The Topic Paper [E7.6] then turns to consider the Exceptions Test, setting out the detailed justification for each site against the relevant considerations required by the NPPF and PPG.

5.6.3 Where allocated sites are located within areas at risk from flooding and/ or drainage capacity issues, opportunities have been identified within these assessments to minimise its impacts on existing property or elsewhere through flood mitigation techniques such as safeguarding land from development at both Chase Park and Crews Hill and/ or through the location of more vulnerable uses away from ground floor locations for example, on sites U.12 or allocating higher risk land for green infrastructure or public open space uses such as on sites R.06 and R.07.

5.6.4 The strategic sites of both Crews Hill and Chase Park also provide significant opportunity to include substantial flood management provision using Sustainable Urban Drainage Systems and storage ponds as identified in Policies SA10.1 to SA10.4 and Policy SA11.1 to SA11.6.

5.6.5 Areas at these sites that are at a higher risk from flooding have been safeguarded for less vulnerable or water compatible uses such as Green Infrastructure.

**Q5.7. Further to the above, are any of the locations identified for growth in the Plan within Flood Zones 2 and 3? If so, has the exception test been carried out and are the conclusions of this justified?**

## Response

5.7.1 Yes. The Plan proposes to allocate the following sites within or partly within Flood Zones 2 and/ or 3a/b, set out in the table below:

**Table 1: Site Allocations with Sites within or partly within Flood Zone 2 and / or 3a/b**

<b>Reg19_SA_R</b>	<b>Site address</b>	<b>Flood Zone 2 (2023) % of the site</b>	<b>Flood Zone 3 (2023) % of the site</b>	<b>Flood Zone 3b (2023) % of the site</b>
SA11.2	Land South of Cattlegate Road	6.82	6.19	0.00
SA.11.1	Land North of Cattlegate Road	5.06	4.44	0.00
SA11.6	Land South West of Theobalds Park Road	0.02	0.01	0.01
SA3.2	Chiswick Road Estate (Oswald and Newdales)	14.75	4.88	0.00
SA3.1	Edmonton Green Shopping Centre	0.01	0.00	0.00
SA7.1	Gas Holder, Pinkham Way, London, N11 1QJ	1.26	0.22	0.22
U.18	Land at Ritz Parade	3.39	0.00	0.00
R.02	Land between Camlet Way and Crescent West, Hadley	13.75	13.15	0.00
U.01	Land known as Brimsdown Sports Ground, Goldsdown Road, Enfield,	0.01	0.00	0.01
U.16	188-200 Bowes Road, London	0.36	0.00	0.00
U.12	241 Green Street	32.97	0.00	0.00

<b>Reg19_SA_R</b>	<b>Site address</b>	<b>Flood Zone 2 (2023) % of the site</b>	<b>Flood Zone 3 (2023) % of the site</b>	<b>Flood Zone 3b (2023) % of the site</b>
SA7.2	Homebase, Station Road, New Southgate	0.04	0.00	0.00
SA4.2	Upton Road And Raynham Road (b)	48.35	3.68	0.00
SA7.3	Ladderswood Estate	6.70	5.69	2.13
U.06	Former Middlesex University Trent Park Bramley Road	0.23	0.23	0.03
SA3.3	Fore Street Estate	14.86	0.00	0.00
SA8.3	Montagu Ind Estate	79.56	0.00	0.00
U.20	Cuckoo Hall Lane Estate	0.60	0.11	0.01
U.15	Kettering Rd Estate, EN3	1.08	0.89	0.67
U.34	5 Picketts Lock Lane	0.01	0.00	0.00
R.03	Land to the north of Mollison Avenue, south of the M25 and east of Freezywater	31.91	0.93	2.50
R.05	Land to North West of Innova Park	12.28	0.00	0.00
U.33	6 Morson Road	9.41	2.02	2.05
U.29	Land to the south of Millmarsh Lane	5.23	1.40	1.41
R.06	Land at Picketts Lock	10.04	1.13	4.79

<b>Reg19_SA_R</b>	<b>Site address</b>	<b>Flood Zone 2 (2023) % of the site</b>	<b>Flood Zone 3 (2023) % of the site</b>	<b>Flood Zone 3b (2023) % of the site</b>
<i>U.28</i>	<i>Land and buildings to the south east of Stockingswater Lane, Brimsdown</i>	<i>0.50</i>	<i>0.23</i>	<i>0.24</i>
<i>U.32</i>	<i>Claverings, Centre Way, London</i>	<i>36.91</i>	<i>0.00</i>	<i>0.00</i>
<i>U.30</i>	<i>Montagu Ind Estate</i>	<i>100</i>	<i>100</i>	<i>0.00</i>
<i>SA5.2</i>	<i>Meridian Water Phase 2</i>	<i>100</i>	<i>54.20</i>	<i>12.04</i>
<i>SA5.4</i>	<i>Tesco Extra, Meridian Water</i>	<i>0.00</i>	<i>0.00</i>	<i>0.09</i>
<i>SA5.3</i>	<i>Former IKEA, Meridian Water</i>	<i>20.05</i>	<i>0.50</i>	<i>0.68</i>
<i>SA5.8</i>	<i>Kenninghall Industrial Estate South, Kenninghall Road, London</i>	<i>98.32</i>	<i>88.94</i>	<i>0.03</i>
<i>SA5.7</i>	<i>Ravenside Retail Park</i>	<i>12.11</i>	<i>3.13</i>	<i>3.55</i>
<i>SA5.6</i>	<i>Meridian East, Harbert Road</i>	<i>99.96</i>	<i>20.70</i>	<i>5.52</i>
<i>SA5.5</i>	<i>Meridian 13 (Tear Drop Site)</i>	<i>16.15</i>	<i>0.00</i>	<i>0.00</i>
<i>SA5.1</i>	<i>Meridian Water Phase 1</i>	<i>56.64</i>	<i>1.54</i>	<i>1.11</i>
<i>SA11.5</i>	<i>Land East of Theobalds Park Road</i>	<i>28.29</i>	<i>23.78</i>	<i>20.05</i>
<i>R.08</i>	<i>Sloemans Farm</i>	<i>0.36</i>	<i>0.17</i>	<i>0.04</i>
<i>SA10.1</i>	<i>Land at Chase Park South</i>	<i>8.54</i>	<i>4.97</i>	<i>4.32</i>
<i>SA10.3</i>	<i>Chase Park North East</i>	<i>8.15</i>	<i>3.25</i>	<i>2.55</i>
<i>SA10.4</i>	<i>Chase Park North West</i>	<i>11.06</i>	<i>9.64</i>	<i>2.46</i>

<b>Reg19_SA_R</b>	<b>Site address</b>	<b>Flood Zone 2 (2023) % of the site</b>	<b>Flood Zone 3 (2023) % of the site</b>	<b>Flood Zone 3b (2023) % of the site</b>
R.07	Whitewebbs Golf Course & Tottenham Hotspur Football Club Training Ground	8.66	6.94	7.48

5.7.2 Sites SA11.2, SA11.1, SA11.6, SA3.1, SA7.1, U.18, U.01, U.16, SA7.2, SA7.3, U.06, U.20, U.15, U.34, U.33, U.29, R.06, U.28, SA5.4, R.08, SA10.1, SA10.3, SA10.4 and R.07 have less than 12% of their site area affected by flooding. In these cases, those parts of the sites located within a higher risk flood zone can suitably safeguard that land from non-water compatible uses.

5.7.3 In those sites where flooding is more prevalent such as sites U.12, SA4.2, SA8.3, U.30, U.32, SA5.8, SA5.1, SA5.2 SA11.5, less vulnerable uses are proposed such as employment land or where residential is identified, flood mitigation measures have been identified such as locating residential uses away from the ground floor.

5.7.4 In accordance with National Planning Policy, the Exceptions Test has been applied to these sites where it is required by national policy. More detail about the Exceptions Test in relation to the above sites can be found in the Enfield Sequential Test and Exceptions Test Topic Paper [E7.6].

## Strategic Transport Issues

**Q5.8. Have the cumulative effects on the transport network been robustly assessed?**

### Response

5.8.1 Yes. For the Enfield Local Plan, use of strategic transport modelling was considered appropriate for long-term effect assessment to guide transport planning and policy decisions<sup>1</sup> and, owing to the fact that strategic transport models are inherently 'cumulative' as they incorporate modelled traffic data changes for future scenarios<sup>2</sup>.

5.8.2 Department for Transport (DfT) Transport Analysis Guidance (TAG) provides information on the use and best practice of transport modelling in ensuring the base year transport model used accurately reflects observed conditions and assessing future scenarios including:

- Changes in land-uses and policies;

<sup>1</sup> <https://tfl.gov.uk/corporate/publications-and-reports/transport-modelling-guidance>

<sup>2</sup> <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>



- Changes to transport systems; and
- Future travel demands and levels of service<sup>3</sup>.

- 5.8.3 According to TAG, it is important to avoid optimism bias in the approach to planning forecast data. To ensure that this is achievable, the DfT publishes a national database of forecast population, households and employment from the National Trip End Model (NTEM). The NTEM model forecasts the growth in trip origin-destinations (or productions-attractions) up to 2051 for use in transport modelling. The forecasts take into account national projections of population, employment, housing, car ownership and trip rates.
- 5.8.4 Preparation of the cumulative scenario assessment and use of NTEM in building the transport modelling assessment scenarios is detailed in TAG Unit M4 Forecasting and Uncertainty. This guidance provides advice on using transport models to prepare future forecasts of demand and supply. This includes guidance on the use of DfT's demand projections in the NTEM dataset to account for and deal with national and local forecast uncertainties.
- 5.8.5 The Council and their consultants WSP have developed and undertaken a transport assessment approach in line with the guidelines outlined, which included a significant amount of transport modelling work using Transport for London's (TfL) strategic transport modelling tools to assess the cumulative effects of the proposed Local Plan on the transport networks. Documentation relating to the work is contained within TRA 1-10 within the Local Plan examination library.
- 5.8.6 TfL have built and maintain a suite of strategic transport models of London and surrounding areas, which were used to assess the cumulative impacts of the Local Plan.
- 5.8.7 These are summarised below:
- A. Four Stage Demand Model – **MoTiON**
  - B. Strategic Highway Assignment Model – **LoHAM**
  - C. Public Transport Assignment Model – **Railplan**
- 5.8.8 MoTiON is a four-stage demand model, developed in line with the DfT TAG Guidance, which uses population and employment data inputs and calculates the trips that will be made, what mode they will take and where they will travel to and from. Ultimately, the MoTiON model was used to develop future 2041-year scenarios, a Reference Case (or Future Baseline) and Local Plan scenarios. See TRA 4 pages 24-86.
- 5.8.9 The Reference Case (or Future Baseline) scenario represents the growth between the base year and the future year as captured in the TfL Reference Case forecast models, but accounting only for committed and consented housing and employment sites across Enfield borough. This scenario

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<sup>3</sup> <https://assets.publishing.service.gov.uk/media/5fbfb271d3bf7f572b163fb9/tag-transport-appraisal-process.pdf>

includes the committed (firm and funded) infrastructure improvements. See TRA4 pages 24-74.

- 5.8.10 The Local Plan and beyond scenario represents the committed and consented sites as well as the Local Plan housing and employment sites. This scenario includes the committed (firm and funded) infrastructure improvements. See TRA4 pages 75-86.
- 5.8.11 The outputs from these MoTiON model runs were then used to assess the cumulative effects of the Local Plan on the highway and public transport networks using LoHAM and Railplan models respectively. See TRA4 pages 87-102, TRA5 and TRA6.
- 5.8.12 A step-by-step summary of the work undertaken using TfL's strategic transport models is outlined below:

#### **A. MoTiON model**

- I. This model was used to reflect the 2041 future year consented developments and Local Plan developments which were incorporated into MoTiON as population and employment changes. See TRA 4 pages 24-86.
- II. MoTiON provided the daily future year travel patterns by mode which are in turn converted into the LoHAM and Railplan assignment models inputs.

#### **B. LoHAM (London Highway Assignment Model)**

- I. Base Year Model
  - Audited within the LBE area to highlight areas where improvements were required to better reflect the status of the transport networks
  - Improved within the LBE area to ensure base year accurately reflects existing transport network conditions
  - Audit carried out following TfL guideline and improvements have been discussed and agreed with TfL, and recorded within the technical notes and Local Model Validation Reports, see TRA3 pages 46-142 and TRA4 pages 1-23
- II. Future Year Models
  - Assessed the impacts of the consented developments and infrastructure schemes in LBE (Reference Case). See TRA4 pages 24-74.
  - Assessed the impacts of the Local Plan development proposals in LBE (Local Plan). See TRA4 pages 75-86.
  - Assessed the impacts of proposed and potential Local Plan mitigations. See TRA4 pages 87-102, TRA5 and TRA6.
  - Process consulted upon and discussed with TfL, Network Rail, National Highways and neighbouring authorities as well as summary of outcomes presented in the Strategic Transport Assessment

## C. Railplan Public Transport Assignment Model

### I. Base Year Model

- Audited within the LBE to highlight areas where improvements were required to better reflect the status of the transport networks
- Improved within the LBE area to ensure base year accurately reflects existing transport network conditions
- Audit carried out following TfL guideline and improvements have been discussed and agreed with TfL, and recorded within the technical notes and Local Model Validation Reports, see TRA3 pages 1-45

### II. Future Year Models

- Assessed the impacts of the consented developments and infrastructure schemes in LBE (Reference Case). See TRA4 pages 24-74.
- Assessed the impacts of the Local Plan development proposals in LBE (Local Plan). See TRA4 pages 75-86.
- Assessed the impacts of proposed and potential Local Plan mitigations. See TRA4 pages 87-102, TRA5 and TRA6.
- Process consulted upon and discussed with TfL, Network Rail, National Highways and neighbouring authorities as well as summary of outcomes presented in the Strategic Transport Assessment.

5.8.13 The Council and WSP have worked closely with National Highways and TfL in particular, since Regulation 18 when the strategic transport modelling process started, to ensure the robustness of the methodology and process followed. Throughout this consultation process, all assumptions have been discussed and agreed at every stage of the work. Outputs of the strategic modelling process have also been shared and discussed with neighbouring authorities.

5.8.14 The transport modelling work also forms the basis of environmental disciplines cumulative assessment, as is the case with Air Quality. The strategic transport modelling work for the Local Plan reflects pre-Covid growth and travel pattern conditions and assumptions. At the time of Air Quality evidence data development TfL made available additional modelling scenarios including post-Covid sensitivity assumptions. A technical note, titled "*LBE Local Plan and TfL Strategic Transport Models FINAL 13.11.2024*", has been developed and agreed with TfL which outlines the changes in TfL's strategic transport models that have occurred since the versions used to support the LBE Local Plan transport capacity testing. Use of the latest models, including specific adaptations for environmental purposes have also been discussed and agreed with Natural England and TfL.

**Q5.9. What strategic transport issues have been identified that would require mitigation to enable the scale of growth envisaged to be delivered?**

## Response

- 5.9.1 Enfield is one of five outer London boroughs that has the greatest potential to achieve cycle trips, as 30% of all car trips in Enfield are less than 2 kms [See IDP2 page 6]. Achievement of the sustainable modes share is the primary 'strategic transport issue' identified, for which the Council has set out transport policies, a roadmap of vision, goals and targets to guide the transport projects and initiatives identified to resolve the sustainable travel issue [See TRA2].
- 5.9.2 The Council has recently concluded a borough wide cycle network development review, including identification of new proposed cycle corridors. This review includes the cycle network expansion to link all Local Plan site allocations [See E3.5 Annex Transport Topic Paper and TRA1 page 52].
- 5.9.3 On the Strategic Road Network (SRN) the modelling work, see TRA4 pages 87-102, TRA5 and TRA6, has evidenced a potential minor detrimental impact on Junction 24 of the M25 roundabout. As part of our ongoing engagement with National Highways for the Local Plan, we have worked closely to find a suitable solution which has been assessed within TfL's highway assignment model LoHAM. The improvement is accepted as appropriate and deliverable by National Highways and details are contained within the National Highways' Statement of Common Ground [SUB14c].
- 5.9.4 TfL, the body which maintains and operates the A10 and A406 strategic corridors within Enfield, will manage potential congestion via demand control mechanism, such as car lite and car free type development in the proximity of the TfL roads to maintain a safe and suitable network.
- 5.9.5 The Council has also identified as the preferred approach to local highway capacity and safety issues the following:
- Demand management.
  - Safety improvements, and
  - Improvement of sustainable travel options.
- 5.9.6 Furthermore, the IDP does include requirements for both on-site and off-site improvements for major site allocations.
- 5.9.7 It is anticipated that effectiveness of such schemes will be tested following further development optioneering and Supplementary Planning Document (SPD) preparation. This would provide an opportunity to test the potential mitigation scheme options in order to identify the most effective local mitigations through local transport tools in terms of both the demand capacity and the alignment with Healthy Street principles and road safety Vizion Zero principles. It is anticipated that these local schemes will be delivered mainly through S106, S278 and S8 mechanism, including requirements for consultation and sign off with the local authority to satisfy the deliverability processes.

- 5.9.8 Finally, the public transport model predicts significant increases in bus demand, see TRA6 pages 20-30, some of which are in areas that have excellent bus frequency and high demand already, such as Enfield Town, the A1010 and the A406 corridors. As a result of the Local Plan, several bus services could reach capacity. Furthermore, the bus network coverage does not extend as far as some of the major site allocations.
- 5.9.9 To offset the impacts, Enfield Council and TfL, the body responsible for managing the bus network in London, have already agreed a comprehensive package of interventions that will improve bus network coverage, capacity and connectivity to support the homes and jobs planned at Meridian Water [See TRA1 page 26 and TfL Bus Action Plan 2022 page 70].
- 5.9.10 Following Regulation 19 publication, Enfield and TfL have also discussed in more detail a possible package of bus mitigations for the other major site allocations. Possible service changes at these locations, such as bus route frequency improvements, new routes and changes in existing patterns, have been tested through strategic transport modelling, indicating there would be good demand to support new services at these locations. The requirement to provide infrastructure and monetary contribution toward such improvements has been captured within the IDP.
- 5.9.11 In conclusion, the strategic transport issues identified include support and development of sustainable transport alternatives to encourage modal shift, this includes:
- Development of the active travel network
  - Improvement of Junction 24 of the M25;
  - Bus improvements ;
  - Local highway safety and healthy street focused interventions

**Q5.10. What transport infrastructure, or other mitigation schemes, have been identified that would address these transport issues? Has the likely effectiveness of proposed transport mitigation schemes been assessed?**

### **Response**

- 5.10.1 A mitigation scheme at Junction 24 of the M25 has been identified by LBE and WSP have actively engaged with National Highways to agree a suitable solution through several meetings throughout 2024, with an improvement scheme presented in July 2024 and subsequently being agreed by e-mail correspondence. Junction impacts and mitigations have been considered through modelling refinements and joint modelling output review with National Highways. The mitigation testing included refinements and revisions to the junction coding to identify the most appropriate scheme. This has been agreed with National Highways as consisting of signage, resurfacing and road markings, to formalise the movement of traffic in two lanes around the roundabout on the circulatory section after the Southgate Road exit. The highway modelling indicates that proposed scheme effectively mitigates the

issues which were anticipated to occur at the M25 Junction 24 as a result of the Local Plan.

- 5.10.2 The proposed transport mitigation scheme has been drawn and taken through an initial safety assessment and discussed with Hertfordshire County Council as neighbouring highway authority. The agreed upon mitigation scheme is contained within the National Highways Statement of Common Ground [SUB14c].
- 5.10.3 As part of the Local Plan, some public transport improvements in the form of bus provision and development highway related option scheme have been assessed within LoHAM and Railplan models. These will be developed further through the Supplementary Planning Document (SPD). However, findings of the initial public transport improvement modelling tests have been shared with TfL in March 2024 and further discussed in June 2024 with regards to cost capture. TfL are content that additional services are required and possible (a combination of extensions to existing routes, frequency enhancements and possibly a new route), but the start date and frequency will follow master planning and planning applications phases.
- 5.10.4 S106 would make significant contributions to the first 3 years of operation (as per TfL's normal modus operandi) before TfL take on the route in its entirety.

**Q5.11. Are there any outstanding concerns on transport matters from Transport for London, National Highways or any other relevant transport authorities?**

**Response**

- 5.11.1 No. Enfield has published a comprehensive Duty to Cooperate Statement [SUB14a], including:
- The transport neighbouring highway authorities London Borough Barnet, Haringey and Waltham Forest and local highway authorities Essex County Council and Hertfordshire County Council, and
  - Planning authorities Epping Forest, Hertsmere, Welwyn Hatfield and Broxbourne.
- 5.11.2 Furthermore, Enfield has agreed Statements of Common Ground with TfL (in August 2024, National Highways (in July 2024) and National Rail (in July 2024) [SUB14c].
- 5.11.3 Updated Statements of Common Ground for National Highways [SUB14c], and other Local Highway Authorities [SUB14d] have also now been signed. As of early January 2025, updated Statements of Common Ground local highways authority were agreed [SUB14d].
- 5.11.4 This confirms there are no areas of disagreement with exception for:

- Transport for London with regards to the strategic spatial planning approach for the green belt areas, noting it does not extend to highways matters, and
- Broxbourne Council (adjacent planning authority) relating to the strategic transport modelling undertaken in support of the Local Plan.

## Other Matters

### Q5.12. Is the spatial strategy and scale of growth justified and consistent with national policy in respect of the effect on air quality?

#### Response

5.12.1 Yes, as discussed below.

5.12.2 The effect on air quality was assessed in detail by WSP on behalf of LBE for the evidence base at the Regulation 19 stage. The Air Dispersion Modelling Assessment, Volume 1 Report [ENV1] includes the following details:

- The relevant air quality standards, critical levels and critical loads against which the impacts were considered [ENV1, Chapter 2].
- Baseline conditions [ENV1, Chapter 3] with cross references to Volume 2 Figures A-1 and A-2 [ENV2].
- Methodology [ENV1, Chapter 4] with cross references to Volume 3 Appendix A (Traffic Data) and Appendix B (Model Verification) [ENV4].
- Findings [ENV1, Chapter 5] with cross references to Volume 2 Figures A-2 to A-20 [ENV2, ENV3 - \*\*\*please note that Figures A-7 to A12 have not been assigned an evidence base document reference but are located here [https://www.enfield.gov.uk/data/assets/pdf\\_file/0033/54969/Reg-18-AQA-Vol2-Figs-A-7-to-A-12-Planning.pdf](https://www.enfield.gov.uk/data/assets/pdf_file/0033/54969/Reg-18-AQA-Vol2-Figs-A-7-to-A-12-Planning.pdf)\*\*\*], Volume 3 Appendix C (Model Results Human Receptors) [ENV5] and Volume 3 Appendix D (Model Results Ecological Receptors) [ENV6].
- Summary and recommendation [ENV1, Chapter 6].

5.12.3 The assessment addressed the potential impacts on ambient pollutant levels and the effects for human receptors within the borough and ecological receptors within 10km, due to predicted changes in road traffic with the full Draft Local Plan in 2041. The changes in pollutant levels were predicted by detailed air quality dispersion modelling. LBE officers and Natural England were involved in discussions concerning scope, methodology and findings.

5.12.4 As documented [ENV1], the assessment was based on road traffic data derived from transport modelling [TRA1] together with predicted vehicle emissions and background air quality data as available at the time. The assessment is inherently cumulative as growth in-terms of other plans and projects was - as far as was reasonably practicable to do so - accounted for in the data used. The air quality model was verified in accordance with Department for Environment, Food and Rural Affairs (DEFRA) guidance, with comparison of model predictions against LBE monitoring data for 2019; the

model was subsequently adjusted to account for systematic underprediction [ENV4, Appendix B] and is considered a robust representation.

### **Impacts at Human Receptors**

- 5.12.5 As documented [ENV1], for human receptors, the magnitudes of the potential impacts on ambient concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) were described for individual receptors according to joint guidelines issued by Environmental UK and the Institute of Air Quality Management [ENV1, Table 4-1].
- 5.12.6 The assessment found that all predictions for NO<sub>2</sub> and PM<sub>10</sub> concentrations meet national standards, with all impacts described as 'negligible'. However, for PM<sub>2.5</sub> the findings are less straightforward.
- 5.12.7 The predicted annual mean PM<sub>2.5</sub> concentrations meet the annual mean standard of 20µg/m<sup>3</sup> (a limit value) in both the 2041 Future Baseline scenario and Draft Local Plan scenario, and the impacts of the Plan can be described as 'negligible'. However, when compared against the national target for 2040 of 10µg/m<sup>3</sup> (note: the Mayor of London's target is to meet this by 2030) widespread non-compliance was found for the 2041 Future Baseline scenario - with the Draft Local Plan resulting in impacts described as 'moderate beneficial' to 'substantial adverse', although most are 'negligible'. As explained [ENV1, paragraph 5.1.7], "The exceedances are because the background concentrations, predicted by Defra, are above 10µg/m<sup>3</sup> across much of Enfield; (...). Also, the latest predicted year for background data is 2030, so any reductions in vehicle exhaust emissions of PM<sub>2.5</sub> that could occur after 2030 are disregarded."
- 5.12.8 It should be noted that since the assessment was undertaken, DEFRA released new data which extend the forecasts of vehicle emissions of nitrogen oxides (NO<sub>x</sub>), PM<sub>10</sub> and PM<sub>2.5</sub> up to 2050 and background concentrations to 2040<sup>4</sup>. The London-wide Ultra-Low Emission Zone is also now accounted for. The background concentrations included in the assessment for the 2041 scenario are based on 2030 backgrounds. This is a conservative assessment, as it is predicted that air quality will improve with time in line with upgrades in vehicle technology. Consequently, the 2040 background concentrations now available are approximately 31% lower on average than those used in the assessment. The implications are that an update of the assessment would likely yield lower predicted concentrations and lesser impacts.

### **Impacts at Ecological Receptors**

- 5.12.9 The approach taken to predicting potential air quality impacts at ecological receptors (Lee Valley Special Protection Area and Ramsar, Wormley Hoddesdonpark Special Area of Conservation, and Epping Forest Special Area of Conservation) was agreed in consultation with Natural England and LUC (LBE's sustainability and ecology consultant).

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<sup>4</sup> <https://laqm.defra.gov.uk/whats-new/>



- 5.12.10 Air quality impacts were predicted at ecological receptors in-terms of changes in annual mean concentrations of NO<sub>x</sub> and ammonia (NH<sub>3</sub>), and deposition rates of nitrogen and acid gases. The impacts were considered in relation to relevant critical levels for NO<sub>x</sub> and NH<sub>3</sub> and critical loads for nitrogen deposition and acid deposition, where a change of no more than 1% of the critical level/load indicates an impact with an effect that is not significant. The impacts were determined for the Draft Local Plan alone and in-combination with other plans and projects.
- 5.12.11 It was found that the only impacts of potential concern to Natural England were within the Epping Forest Special Area of Conservation, very close to roads that the transport model predicts will experience increased traffic [TRA1]. The significance of these impacts has subsequently been considered by LUC and Natural England and the matter resolved with agreement being reached in October 2024 that the impacts would not give rise to a significant effect; this is set out in the SoCG with Natural England [SUB14a]. The SoCG is currently in the process of being updated and a draft can be found in [SUB14h].

### **Consistency with National Policy**

- 5.12.12 With the possible exception of PM<sub>2.5</sub> impacts in-relation to national and the Mayor of London's targets for PM<sub>2.5</sub> for 2040 and 2030 respectively, findings from the air quality assessment clearly demonstrate that the Draft Local Plan aligns with the requirements of National Planning Policy Framework<sup>5</sup>, paragraph 199.
- 5.12.13 With regard to PM<sub>2.5</sub> targets, DEFRA is currently "... developing guidance for applicants and Planning Authorities in England to demonstrate that they have appropriately considered the PM<sub>2.5</sub> targets when making planning applications and planning decisions."<sup>6</sup> DEFRA's interim guidance on this was issued in October 2024 and states:
- "The new approach moves away from a requirement to assess solely whether a scheme is likely to lead to an exceedance of a legal limit and instead ensures that appropriate mitigation measures are implemented from the design stage, streamlining the process for planning and ensuring the minimum amount of pollution is emitted and that exposure is minimised.
- 5.12.14 Pending publication of the new guidance, applicants are advised to provide evidence in their planning applications that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM<sub>2.5</sub> and its precursors as far as is reasonably practicable. If quantitative evidence is not available, a qualitative approach can be taken."
- 5.12.15 In London, planning authorities already have a means of ensuring this under the current London Plan<sup>7</sup>. Site allocations that are brought forward for development in the future that are subject to masterplan or Environmental

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<sup>5</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>6</sup> <https://uk-air.defra.gov.uk/pm25targets/planning>

<sup>7</sup> <https://www.london.gov.uk/programmes-strategies/planning/london-plan>

Impact Assessment will be required to address Air Quality Positive requirements, which will ensure that opportunities to improve air quality or mitigate impacts are properly addressed.

**Q5.13. Is the Plan effective in ensuring adequate provision of infrastructure and local services to deliver the spatial strategy, in particular those relating to education, health and green infrastructure?**

**Response**

- 5.13.1 Providing new and enhanced physical, social and environmental forms a pinnacle role of the Spatial Strategy and the spatial options as identified within table 2.1 and table 2.2 the IIA [SUB8]. This demonstrated that to secure and deliver meaningful infrastructure for the Borough, can only be delivered by supporting a higher proportion of growth as identified within Q5.2.
- 5.13.2 The provision of infrastructure is therefore intrinsically linked throughout the Plan from the Vision, the Objectives – particularly objectives 6, 7, 12, 17 and 18, the strategic policies of SS1, SS2 through to the proposed allocations.
- 5.13.3 Throughout the plan preparation process, the Council sought information about the capacity of existing infrastructure – including that for education, health and green infrastructure - and future investment which are documented within the Infrastructure Baseline Assessment [ref?] and through the Duty to Cooperate process. This was particularly relevant in terms of understanding health and education capacity and future provision.
- 5.13.4 Where specific issues with existing infrastructure provision were identified, the Council identified likely opportunities to either improve the provision or provide new infrastructure through individual evidence base. For example, the Strategic Transport Assessment identifies the existing issues with transport infrastructure and identifies suitable and deliverable mitigation measures to help reduce developments impact on existing infrastructure capacity.
- 5.13.5 The Council's Blue and Green infrastructure Baseline Audit [INF2], the blue and green infrastructure Strategy [FLD3] and the Play Pitch Strategy<sup>8</sup> has helped to identify what type of open space/green infrastructure is required to support growth. The Council's Built Facilities Study identifies the level of investment required to improve existing built leisure and sports facilities.
- 5.13.6 The Strategic Flood Risk Assessments [FLD1-FLD4] have identified what flood mitigation infrastructure is required to reduce the impact of flooding within new and existing developments.
- 5.13.7 The Chase Park and Crews Hill Topic Papers and evidence base [PLA1-PLA16] have identified the likely need for infrastructure to support the strategic growth of these sites.

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<sup>8</sup> Play Pitch Strategy

[https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0021/5709/playing\\_pitch\\_strategy\\_sports\\_180319.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0021/5709/playing_pitch_strategy_sports_180319.pdf)

5.13.8 To help deliver the infrastructure required to support growth, each site allocation policy details the type and scale of infrastructure to help mitigate its impacts on the capacity of existing infrastructure provision.

**Q5.14. Does the evidence on whole plan viability and infrastructure demonstrate that the spatial strategy can viably deliver the housing, employment floorspace and infrastructure required to support the growth proposed?**

**Response**

- 5.14.1 Yes. Viability was considered in the 2023 Whole Plan – Viability Update, (HDH Planning & Development Ltd, August 2023). Please see the response to Question 5.15 which considered the WPVA more widely.
- 5.14.2 An important aspect of the WPVA was to consider development's ability to bear the costs of strategic infrastructure and mitigation, required to enable development to come forward.
- 5.14.3 CIL is an important source of funding, the costs of the Mayoral CIL and LB Enfield CIL were treated as a cost in the appraisals.
- 5.14.4 In addition to CIL allowance was made for SAMM and SANG payments. A further allowance for developer contributions – in addition to CIL - was also made (1-9 units £2,500 per unit, 10 -99 units £5,000 per unit, 100-249 units £7,500 per unit and 250+ units £9,000 per unit).
- 5.14.5 In relation to the large greenfield strategic sites Chase Park and Crews Hill an allowance for infrastructure of £50,000 per unit in addition to CIL was assumed.
- 5.14.6 Seeking s106 contributions is subject to CIL Regulation 122 that sets out that contributions must be; necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. The actual costs of strategic infrastructure and mitigation will vary from site to site. Sensitivity testing of up to £100,000 per unit was included in the WPVA with the results being set out in Appendix 16 of the WPVA. This showed that Chase Park had capacity to bear up to £70,000 per unit (in addition to CIL and that Crews Hill had capacity to bear up to £30,000 per unit in addition to CIL (based on 50% affordable Housing). Taking CIL and the s106 contributions together the planned development can viably deliver the infrastructure required to support growth proposed.
- 5.14.7 The infrastructure cost for the strategic sites was not finalised when the WPVA was being completed. HDH recommended that as and when this is established, it would be necessary to reconsider deliverability to ensure the sites can bear their full strategic infrastructure and mitigation costs. The Council has taken this advice on board and Aspinall Verdi – Property Regeneration Consultants were instructed in the spring of 2024 to prepare a Delivery Strategy for the Chase Park and Crews Hill sites (which included a more detailed review of the strategic infrastructure costs and viability).

5.14.8 The Delivery Strategies provide:

- A working approach to viability modelling, reflecting the area wide, site allocation and individual parcel nature of the areas.
- A working approach to implementation via appropriate planning mechanisms (such via SPD, S106, levies, tariffs), with associated guidance on governance and procedures.

5.14.9 The AspinallVerdi approach has been to consider all the aspects required for successful delivery. Their focus has been on land assembly; financial viability and funding; planning policy and consents; and delivery mechanism. Demand and market values for residential development are evidenced through the Local Housing Need Assessment 2020 and the Local Plan Viability market research (which has been reviewed). Sustainable design for the purposes of delivery is reflected in the framework masterplan and Policy requirements; and community engagement has been through the Local Plan consultation process.

5.14.10 AspinallVerdi have brought mediative techniques to engaging with the landowners and site promoters. As part of their approach, they have assessed and demonstrated that the majority of landowners within Chase Park and the Crews Hill allocations are in favour of the development and that there is a route to delivery. Fundamentally, both the Council and the Landowners/Developers need each other to work together to deliver both the infrastructure and housing.

5.14.11 AspinallVerdi has engaged with the Landowners/Developers through a series of Developer Forums (5 in 2024) and through 1-2-1 meetings.

5.14.12 Turner & Townsend (T&T) cost consultants have been retained to define and refine the infrastructure items and their associated costs. T&T has sought to identify and schedule those costs which are:

- Masterplan Framework Costs – these are costs that are directly related to the site-wide masterplan (Policy Map Extract and the Illustrative Spatial Framework) and policies PL11 and PL10.
- Other Infrastructure Costs – these are other site-wide / strategic infrastructure costs that are likely to be required for site-opening up, but which are not be on the plot (house-builders) costs.

5.14.13 AspinallVerdi has reviewed the HDH WPVA in the context of other value and cost assumptions and updated these where necessary. They have prepared detailed Master-developer appraisals and house-builder appraisals, and these have been consulted upon through the Developer Forums. The appraisals demonstrate that policies PL10 and PL11 are viable; and the structures have been established to maintain the infrastructure schedule, cost plan and appraisals under review.

5.14.14 Furthermore, the AspinallVerdi Delivery Strategies set out detailed Risk Assessments and Strategic Delivery Plan(s) / Action Plans which are currently being implemented. For example, through the procurement of SPD / masterplans, the allocations will be refined having regard to the Delivery Strategies; which will feedback through the Cost Plan and appraisal; to viability and delivery. This is part of an ongoing iterative process in the normal course of planning and development working in partnership.

**Q5.15. In general terms, does the Whole Plan Viability Assessment use a robust methodology and is it based on proportionate up-to-date and accurate data?**

### **Response**

- 5.15.1 Yes. The Council's viability evidence is set out in 2023 Whole Plan – Viability Update, (HDH Planning & Development Ltd, August 2023 [ref]).
- 5.15.2 HDH were commissioned to prepare the *Whole Plan and CIL – Viability Update* (HDH, April 2021). The 2021 Viability Update was published with the Regulation 18 consultation. The 2023 Viability Update refreshes the 2021 Viability Update (but does not further consider a review of CIL) and picks up the Council's changes to the emerging Local Plan.
- 5.15.3 The WPVA was prepared in line with the requirements of the NPPF and the PPG (Chapter 10) and follows the Harman Guidance and conforms with the RICS Guidance (HDH is regulated by the RICS). The 2021 Viability Update included a period of technical consultation with the development industry and the 2023 iteration included a review of the comments made through the Regulation 18 process - however no specific technical comments or criticisms (or additional evidence) were submitted at that stage.
- 5.15.4 The WPVA is based on the Existing Use Value (EUV) Plus approach required under the PPG. It is based on modelling a set of 19 typologies. These typologies are representative of the type of development that is anticipated to come forward in LB Enfield over the plan-period. These range from large scale flatted schemes through to smaller greenfield sites. In addition, two large greenfield strategic sites were modelled, being Chase Park (3,611 units) and Crews Hill (5,389 units). Whilst the Meridian Water area is a strategic site, it is in multiple ownerships (including the Council's) so was not modelled as a whole, however three typologies that are representative of the type of development that may come forward in that area were also modelled. A range on non-residential uses were also modelled. The details of the modelling are set out in Chapter 9 of the WPVA.
- 5.15.5 The values of market housing (including specialist older people's housing and student housing) were researched, based on published data sources, price paid data from the Land Registry and asking prices of newbuild and existing homes. The values of affordable housing were also derived. The values of non-residential uses are also researched, as were land values. The land value research was informed by the prices paid (from the Land Registry) for recently approved schemes. The Council's area was divided into three broad value areas:

- **Higher Value** The western and northern areas of the Borough (Chase, Cockfosters, Highlands, Grange, Palmer's Green, Southgate, Winchmore Hill).
- **Medium Value** The areas not included in the higher and lower values – being focused on the town of Enfield.
- **Lower Value** The eastern part of the Borough running from Enfield Lock in the north, to Upper Edmonton in the south.

5.15.6 The details of the residential research is set out in Chapter 4 of the WPVA, the details of the non-residential research is set out in Chapter 5 of the WPVA. The details of the land value research is set out in Chapter 6 of the WPVA.

5.15.7 The costs of development, were estimated, as per the 'standardised inputs' set out in the PPG. The costs of construction were based on the BCIS costs, and allowances made for site costs, abnormal costs, contingencies, fees, finance costs etc. An allowance was also made for developer's return (i.e. profit) which is treated as a cost in the appraisals.

5.15.8 The purpose of the WPVA was to consider and inform the development of the Local Plan and, to assess the cumulative impact of the policies on the planned development. The impact of the policies in the London Plan and the emerging Local Plan were considered in in Chapter 8 of the WPVA.

5.15.9 A core aspect of the assessment was to consider development's ability to bear the costs of strategic infrastructure and mitigation. CIL is an important source of funding, the costs of the Mayoral CIL and LB Enfield CIL were treated as a cost in the appraisals. A further allowance for developer contributions was also made (1-9 units £2,500 per unit, 10 -99 units £5,000 per unit, 100-249 units £7,500 per unit and 250+ units £9,000 per unit). In the relation to the large greenfield strategic sites Chase Park (3,611 units) and Crews Hill (5,389 units) an allowance of £50,000 per unit in addition to CIL was assumed.

5.15.10 Sets of appraisals were run, and through an iterative process between the Council and HDH the following policy requirements were developed:

- Affordable Housing Brownfield sites 35%
- Greenfield sites 50%
- Design 90% Part M4(2), 10% Part M4(3)
- Water efficiency
- 10% Biodiversity Net Gain
- Zero CO2 Regulated and Unregulated - Option 2

- Allowance was also made for s106 contributions for SAMM and SANG payments, public art, skills and libraries.

5.15.11 As set out in Chapter 10 of the WPVA, this was caveated as on this basis, not all development is viable, particularly on sites and in the lower value east of the Borough. In these cases, it was recommended that the Council accepts site specific viability assessments at the development management stage.

5.15.12 At the time of the WPVA, the infrastructure cost for the strategic sites was not finalised. HDH recommended that as and when this is established, it would be necessary to reconsider deliverability to ensure the sites can bear their full strategic infrastructure and mitigation costs. The Council has taken this advice on board and AspinallVerdi were instructed in the spring of 2024 to consider the deliverability of the Chase Park and Crews Hill sites.

5.15.13 The WPVA also noted that the Council should be cautious about including sites in the east of the Borough in the Plan, and only rely on them to deliver the housing requirements where they can be confident that the sites are actually deliverable. Factors may include a recent planning consent, confirmation from the landowner, the site being in public sector ownership, or there being public sector intervention and/or involvement.

5.15.14 A WPVA is based on a series of estimates and assumptions that are subject to change. The impact of changes in costs and values were assessed as part of sensitivity testing (Appendix 18).

5.15.15 In summary, the WPVA has been prepared in line with the requirements of the NPPF and PPG. Its preparation included informal technical consultation and then was subject to formal consultation through the Regulation 18 process. The Council policies in the WPVA were informed by the viability process.

### **Issue 5.3: Whether other aspects of Policy SS1 are justified, effective, consistent with national policy and in general conformity with the London Plan**

#### **Q5.16. Are the overarching approaches to Town Centres, Residential Communities and Metropolitan Open Land, as set out in criteria 7, 8 and 9 of Policy SS1 justified, effective and consistent with national policy?**

#### **Response**

5.16.1 Criterion 7 seeks to focus growth to the urban place making areas, which include the borough's major and district centres. As the 'major urban foci of high-quality growth', the centres will accommodate a range of uses and activities, and serve as focal points in the blue green network.

5.16.2 The Council considers the approach to be justified, as alternative spatial growth options were considered at Regulation 18 stage (see LUC 2024 IIA [SUB8] Table 2.1), with the selected preferred option 2C focusing growth at

urban placemaking areas, as well as two residential-led rural placemaking areas.

- 5.16.3 The approach is considered by the Council to be effective, as a substantial quantum of growth is allocated towards the urban placemaking areas. The allocated sites within the urban placemaking areas are set to deliver over 26,000 homes over the lifetime of the plan.
- 5.16.4 The approach is considered by the Council to be consistent with national policy. The NPPF (December 2023) paragraph 90 seeks to steer growth to town centres in preference to more peripheral locations. In addition, the Town Centres and Retail PPG highlights town centres as locations for main town centre uses as well as a range of complementary uses (Paragraph: 001 Reference ID: 2b-001-20190722).
- 5.16.5 Criterion 8 identifies residential communities as locations suitable for more incremental change, namely smaller scale developments, improvements to connectivity, local environmental improvements, and gentle densification.
- 5.16.6 The Council considers the approach to be justified, as the 2024 Character of Growth Study [DES1-42] identifies these areas as locations for 'medium' or 'limited' change. The study recommends that:
- 'Most of the borough should experience medium level of change - this means infill and gentle densification. Transformative change should occur mainly in industrial, retail parks and around transport nodes and town centres - as well as some isolated areas throughout the borough where the quality is particularly poor. Limited change is mainly concentrated around conservation areas and places with heritage assets. [DES3]'*
- 5.16.7 The Council considers the approach to be effective, as there are fewer site development opportunities in already-established residential communities. These suburban residential locations also lack the infrastructure and amenities needed to support large scale development. The incremental pattern of development advocated by Criterion 8, delivering modest growth and improvements to connectivity and environmental quality, aligns with the Enfield Council Plan priorities to deliver clean and green places, and strong, healthy, and safe communities.
- 5.16.8 The Council considers the approach to be consistent with national policy, as the level of change envisaged for residential communities is consistent with NPPF (December 2023) paragraph 128 which identifies 'the desirability of maintaining an area's prevailing character and setting' as a factor to consider when seeking to make the most efficient use of land.
- 5.16.9 Criterion 9 sets out the role of Metropolitan Open Land and lists its functions, including as locations for open-air facilities, landscape value, and as part of green chains.
- 5.16.10 The Council considers this approach to be justified and effective, as the functions of Metropolitan Open Land as set out in criterion 9 aligns with the key characteristics set out in London Plan Policy G3. The LUC (2023) Green



Belt and MOL assessment [GRE1] assessed the performance of Enfield's MOL against the London Plan criteria, and made recommendations to support enhancements and reduce harm.

5.16.11 The Council also considers the approach to be consistent with national policy, as the NPPF (December 2023) indicates that strategic policies should make sufficient provision of green infrastructure (paragraph 20), including as part of habitat networks (paragraph 181).

**Issue 5.4: Whether the Key Diagram effectively illustrates the spatial strategy and indicates the broad locations for development proposed in the Plan.**

**Q5.17. Does the Key Diagram (Figure 2.4) effectively and accurately illustrate the spatial strategy?**

**Response**

5.17.1 Yes. The key diagram effectively and accurately illustrates the spatial strategy.



5.17.2 As per PQ26, if the inspector is so minded, the Council would amend the label "gentle densification" to "contextually appropriate densification" which is proposed as an amendment to aid clarity.

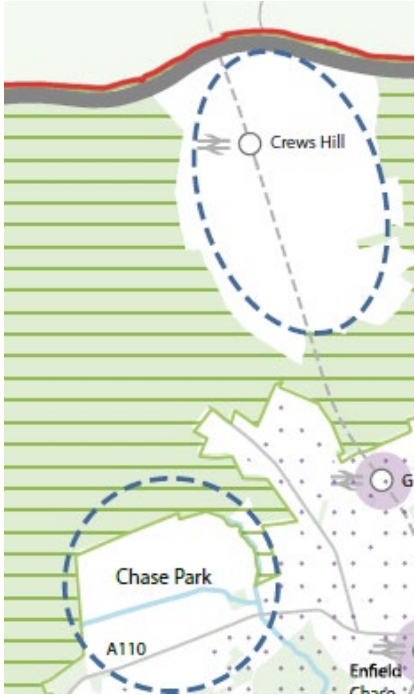
5.17.3 The Council notes that further clarifications could be made to make the key diagram to maximise clarity for the reader. We would support consideration of the following amendments<sup>9</sup>:


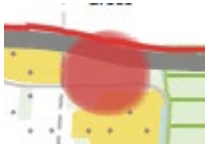

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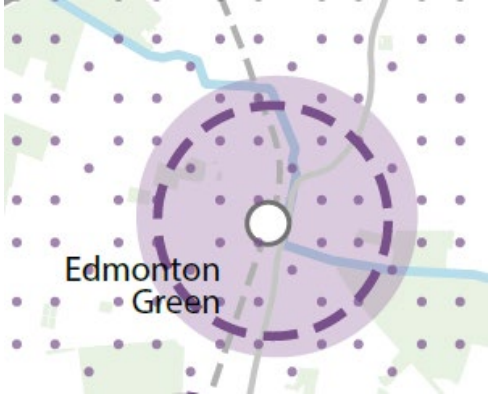
<sup>9</sup> Not currently carried forward as part of [DMOD1].

**Table 2: Proposed Amendments to Key Diagram**

<b>Item</b>	<b>Clarity issue</b>	<b>Proposed amendment</b>
Rural Enfield Policy hatch and Green Belt overlap	Rural Enfield policy area not covering all of the Green Belt (PQ32)	Clarify that Rural Enfield covers all of Green Belt. See PQ32.
<p>Growing and learning area</p> 	Highlights borough's existing centres of agricultural and horticultural education for context. This is not needed for the key diagram.	Remove to avoid unneeded focus on context.
 <p>Potential future areas for new industry and logistics</p>	Orphaned concept from a previous iteration of the plan which has been superseded into policies related to SIL.	Remove to avoid confusion.

Item	Clarity issue	Proposed amendment
 <p data-bbox="203 1102 748 1134">Consistency in illustrating GB Release</p>	<p data-bbox="936 316 1498 533">Greenbelt release is proposed for both PL10 and PL11 and is discussed thoroughly with these strategies. It is therefore implied in the key diagram that greenbelt release is happening but this is not explicit.</p>	<p data-bbox="1520 316 2040 384">Addition of new “GB Release Areas” hatch to these areas to aid clarity.</p>
	<p data-bbox="936 1193 1364 1225">MOL is not labelled in the key.</p>	<p data-bbox="1520 1193 1794 1225">Add a key for MOL</p>

Item	Clarity issue	Proposed amendment
 <p>MOL and Gentle Densification hatch interaction.</p>	<p>Gentle densification hatch is layered over MOL.</p>	<p>Remove hatch from MOL to avoid misinterpretation that development is encouraged on MOL.</p>
 <p>New SIL and GB Release interaction</p>	<p>GB release areas for SIL do not show SIL clearly.</p>	<p>Amend GB release hatch to clearly show SIL layer below.</p>
 <p>Centre of sporting excellence – Southbury</p>	<p>Highlights borough's existing sport facility for context. This is not needed for the key diagram.</p>	<p>Remove to avoid unneeded focus on context.</p>

Item	Clarity issue	Proposed amendment
 <p data-bbox="203 735 909 807">Intensification around transport nodes and town centres and gentle densification hatch interaction.</p>	<p data-bbox="936 316 1458 499">Gentle densification hatch is layered over Intensification around transport nodes and town centres marker, causing confusion over level of change.</p>	<p data-bbox="1520 316 2051 387">Remove gentle densification hatch to provide a clear distinction.</p>

**Q5.18. Is the key diagram accurate with regard to the following factors: a) the extent of the Green Belt and Metropolitan Open Land (MOL)? b) the relationship between the concept of ‘gentle densification’ and MOL? Is it the case that the Plan allows for ‘gentle densification’ within areas of MOL? c) the relationship between the concept of ‘gentle densification’ and areas identified for ‘intensification around transport nodes and town centres’? Are these two policy approaches compatible?**

## **Response**

### **The extent of the Green Belt and Metropolitan Open Land (MOL)?**

5.18.1 Yes – both the Green Belt and MOL boundary are shown accurately. The Council notes that the Key Diagram could more clearly differentiate between MOL and Green Belt land (by providing a different annotation for MOL and adding this annotation to the key). As per the Council’s response to Q5.17, a modification is proposed (as outlined above), to aid clarity.

### **The relationship between the concept of ‘gentle densification’ and MOL? Is it the case that the Plan allows for ‘gentle densification’ within areas of MOL?**

5.18.2 Please refer to the Council’s response to PQ26 for discussion on the term “gentle densification” where the Council proposes, if it is considered appropriate by the Inspector, to amend the label “gentle densification” to “contextually appropriate densification” to aid clarity.

5.18.3 The Plan is not intended to allow for “gentle densification” (or “contextually appropriate densification”) within areas of MOL. The intention of the diagram is to show that in the urban area, outside of the areas shown as “intensification around transport nodes and town centres”, “gentle densification” (or contextually appropriate densification”) will be generally appropriate, although not in those protected by MOL designation. The Council acknowledges that this could be misinterpreted by a reader of the plan and reduce clarity. Therefore, the council will, if it is considered appropriate by the Inspector, amend this diagram to remove the “gentle densification” (or “contextually appropriate densification”) hatching from the MOL areas. Please refer to the response to Q5.1 for details.

### **The relationship between the concept of ‘gentle densification’ and areas identified for ‘intensification around transport nodes and town centres’? Are these two policy approaches compatible?**

5.18.4 The two policy approaches are compatible; they illustrate the different amounts of development and transformation that should take place in different parts of the Borough. This approach sets a clear hierarchy where highly accessible areas (town centres and / or transport hubs) and placemaking areas are focuses for higher levels of transformation, whereas the areas outside and between are expected to have a lower magnitude of change (i.e. “contextually appropriate intensification”).

5.18.5 In terms of the Key Diagram, the Council notes that the “gentle densification” hatching currently overlaps with the “intensification around transport nodes and town centres” annotation. To better communicate the strategic policy intent, and to aid clarity, the Council would like to propose a modification to the Key Diagram, to remove the “gentle densification” hatching from within the areas identified for “intensification around transport nodes and town centres”. Please refer to the Council’s response to Q5.17.

**Q5.19. Is the relationship between concepts identified on the Key Diagram and policy clear? For example, is the Plan clear how ‘gentle densification’ and ‘intensification around transport nodes and town centres’ will be implemented?**

### **Response**

5.19.1 Notwithstanding the Council’s suggested amendments to the Key Diagram (see responses to Q5.17 and Q5.18) we believe that the Plan is clear on how the concepts identified on the Key Diagram interacts with policy.

5.19.2 The Council has taken a layered approach with strategic objectives operating at different scales and level of detail depending on the level of change proposed. This is outlined below for clarity.

### **Placemaking Areas**

5.19.3 The rural and urban place-making areas are indicated on Figure 2.4. These correspond to the areas of highest change designated under Policies PL1-PL11. These policies bridge the gaps between site allocations and the key diagram and coordinate different infrastructure, green space and housing needs at a place level. The placemaking areas are focused on the areas subject to the highest level of change, as described in SS1, paragraph 6. These each have specific policy requirements that will ensure implementation.

### **‘Gentle densification’ (or “contextually appropriate densification”) and ‘intensification around transport nodes and town centres’**

5.19.4 Outside of the placemaking areas, the appropriate level of change that development should deliver is described firstly through the site allocations (see ELP Appendix C). Outside of the site allocations or placemaking areas Policy DE1: DELIVERING A WELL-DESIGNED, HIGH QUALITY AND RESILIENT ENVIRONMENT and Figure 7.1 guide and recommend the appropriate levels of change across the urban area. The level of change recommended is informed by the Borough’s typology areas balanced with the sustainability of location. This draws on the Character of Growth evidence base [DES2-41], proposing appropriate types and densities of development to encourage appropriate densification of the urban area. The Character of Growth recommendations helped to inform what areas would be more susceptible to change, for instance, which transport nodes became focuses for intensification (as shown on the Key Diagram). The final map can be found here: ([Map link](#)) and the methodology and final recommendations found in the report in sections 2.01-2.14.

5.19.5 The Council intend to bring forward an SPD to set out these design parameters following adoption of the ELP.

### **Strategic Industrial Land**

5.19.6 The strategic objectives for industrial land and intensification are presented in the employment policies in ELP Chapter 9.

5.19.7 Additionally, the design and how these new forms interact with the rest of the urban environment are led by the following policies:

- DE1 Delivering a well-designed, high quality and resilient environment
- DE6 Tall Buildings
- DE8 Design of Business Premises

5.19.8 The strategic objectives for industrial land and intensification are implemented in the Rural Enfield policies in chapter 11.

### **Sports and Burial Areas**

5.19.9 These are site specific but strategic uses are discussed within each site allocation.

### **Issue 5.5: Whether the allocations in the Plan have been selected using an appropriate methodology based on proportionate evidence.**

**Q5.20. Is the approach to the assessment and selection of sites, as set out in the Site Allocations Topic Paper justified? Does the submitted evidence demonstrate that the sites have been selected on a robust, consistent and objective basis?**

### **Response**

5.20.1 The Council considers the site selection process to be robust, consistently applied and objective. A summary of the site selection process is provided below; more detail is set out within the Council's Site Allocation Topic Paper [TOP2].

5.20.2 To make the site selection process as consistent as possible, section 4 of the Site Selection Allocation Topic Paper [TOP2] provides a clear process on how sites have been appraised in combination with other evidence base documents such as the HELAA [HOU1] and the IIA [SUB8]. The methodology identifies a four-stage process, as follows:

#### **Stage 1a, b and c**

5.20.3 A sieving process was applied to all sites through the LAA [BG-030], which served the purpose of discounting sites at an early stage that have either: no realistic prospects of delivery; are considered unsuitable for their proposed use due to identified locational or land constraints or fail to meet the required capacity thresholds (sites must be capable of accommodating 25 dwellings or for non-residential development 0.25ha or 500sq).



## Stage 2

- 5.20.4 The remaining site options were assessed and categorised by a R.A.G system to prioritise the allocation of land within the urban area, with an emphasis on brownfield sites, as well as ensuring that they conform with the emerging spatial strategy for the pattern and scale of development in the Borough. Sites were initially considered based on the sequential approach to direct growth to specific locations, based on a hierarchy. The hierarchy sought to ensure that previously developed land (PDL) in the urban area was given the highest priority, with isolated greenfield sites in the Green Belt given the lowest priority. Access to strategic transport and local services and facilities were also assessed at this stage to ensure locations had the greatest potential to contribute positively towards sustainable development.
- 5.20.5 The ranking of sites was based on the site as a whole. In some circumstances (particularly regarding larger sites) this resulted in a site being considered accessible because one part of it adjoined into the urban area. Due to site size the furthest extreme of such sites are not close settlement boundaries and therefore not considered accessible.
- 5.20.6 Sites that fell within priorities 1-2 have generally been considered suitable for inclusion in the plan. However, some exceptional reasons – such as their potential contribution towards delivering new infrastructure as a larger site allocation - meant this was not the case and reasons have been recorded. Sites that fell within priorities 7-8 were generally be considered unsuitable for inclusion in the plan, but as with the previous category, there were some exceptional justifications why they were included and this has be identified as appropriate. These exceptional reasons for taking forward land in priorities 7-8 relate to parcels of land at both Crews Hill and Chase Park. It is considered that in isolation these parcels would not contribute positively towards achieving sustainable development as they would not provide the critical mass for sufficient infrastructure or homes. However, when considered collectively with other surrounding parcels of land, the larger areas of land have the potential to support the delivery the spatial strategy, whilst limiting its impact on the Green Belt through design and mitigation.
- 5.20.7 Sites that fell within priorities 3 to 6 were considered to have potential for inclusion, to varying degrees. For these sites the next stage included a more detailed assessment to refine the criteria of selection, using planning judgement to determine if these sites could be taken forward for allocation.

## Stage 3

- 5.20.8 This stage concentrated on non-absolute constraints which are detailed in Table 5 of the Site Allocation Topic Paper [TOP2], how each site performed against them and if these constraints could be overcome. Rather than assessing sites against a range of quantitative standards, each site was considered qualitatively against each constraint. All sites not excluded from this stage were automatically taken forward to the next stage.
- 5.20.9 The assessment of sites comprised the consideration of several key criteria including Green Belt (as part of Stage 3) flood risk, and highways. In

addition, the potential impact on landscape, historic assets ecological designations, utilities, education, health facilities were considered. There is an importance associated when taking a qualitative approach when analysing sites using these criteria.

#### **Stage 4**

5.20.10 All sites carried forward from the initial sift of sites were subject to IIA [SUB8]. This is to ensure that sites which were deemed 'reasonable alternatives' have been considered against the IIA objectives in paragraph 2.63 to determine their sustainability. Sites have been considered against 18 objectives included in the Regulation 18 IIA (2021) and from paragraph 2.36 in the updated Regulation 19 IIA (2023). The objectives as part of this were adapted from the Integrated Impact Assessment Scoping Report (May 2020). For employment and retail sites, different factors are included to take account of specific elements for employment uses and the locational requirements of different economic sectors.

#### **Stage 5**

5.20.11 This stage considered the deliverability of sites and the timescales and phasing of delivery. The starting point was the assessment of achievability contained from page 39 of the HELAA [HOU1] and the anticipated delivery time set out in the housing trajectory. The deliverability of the sites has been assessed via a high-level assessment of whether development would be economically viable. This was informed by the Council's Whole Plan Viability Assessment [VIA1]. This indicated whether there is a reasonable prospect of each site being delivered and when a key requirement of national planning policy.

5.20.12 The staged process enabled the Council to fully assess the suitability, availability and deliverability of land consistently and in line with the objectives of the Local Plan, the wider spatial strategy and the principles of national policy.

**Q5.21. Was the criteria used in the initial sift of sites (Stage 1 of the process) justified, in particular the 'absolute constraints'?**

#### **Response**

5.21.1 Yes, the Council considers that the criteria used in the initial sift of sites, including the identification of 'absolute constraints,' was justified and effective. The method, as set out in the Site Allocation Topic Paper [TOP2], aligns with the guidance provided in the Planning Practice Guidance (PPG), specifically the section on Housing and Economic Land Availability Assessment (HELAA).

#### **Relevant PPG Guidance**

5.21.2 Paragraph 017 of the PPG on Housing and Economic Land Availability Assessment states: *"Plan-makers should assess a site's suitability for development against the development plan, national policies, and other relevant factors. This includes any physical or environmental constraints,*

*such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution, or contamination."*

5.21.3 The Council applied these principles during the Stage 1 site selection process, ensuring that sites with absolute constraints, those that render development unsuitable or unachievable were identified and excluded from further consideration. This aligns with the guidance to provide clarity and focus resources on sites with realistic potential for development.

### **Absolute Constraints Used**

5.21.4 The absolute constraints identified in the Council's methodology included:

- Sites within the functional floodplain (Flood Zone 3b), which are subject to the highest flood risk and defined as areas where water has to flow or be stored in times of flood.
- Special Areas of Conservation (SAC), protected under the Habitats Directive due to their international ecological significance.
- Sites of Special Scientific Interest (SSSI), designated for their national importance in terms of wildlife, geology, or landform.
- Special Protection Areas (SPA), Ramsar sites, and National Nature Reserves (NNR), which are critical for biodiversity.
- Ancient Woodland, which is irreplaceable in terms of biodiversity and heritage value.
- Grade 1 and Grade 2 agricultural land, which is protected for its contribution to food production.
- Alternative Natural Greenspace (SANG), which mitigates the recreational impacts on protected habitats.

5.21.5 The use of these criteria reflects the requirements outlined in the PPG to consider physical and environmental constraints, as well as policy protections under national and local designations.

### **Justification for Approach**

5.21.6 By identifying absolute constraints at the outset, the Council provided clear guidance on which sites were inherently unsuitable for development. This approach ensures efficient use of resources by excluding unviable sites early in the process, in line with PPG guidance.

5.21.7 The criteria used for absolute constraints reflect statutory protections and policy requirements under the National Planning Policy Framework (NPPF), including the need to conserve and enhance biodiversity (NPPF Paragraphs 179–182) and manage flood risk sustainably (NPPF Paragraphs 159–161).

5.21.8 The exclusion of sites with absolute constraints ensures that the Local Plan promotes sustainable development, balancing growth with environmental protection, as required by the NPPF and PPG.

5.21.9 Sites with constraints that could potentially be mitigated (e.g., those requiring biodiversity offsetting or flood mitigation measures) were retained for further assessment. This iterative process, involving consultation with statutory

consultees such as Natural England and the Environment Agency, ensured that only feasible and sustainable sites progressed.

### **Example of Absolute Constraints**

5.21.10 A site within Flood Zone 3b was excluded during Stage 1 as per the Environment Agency's flood risk maps, which define these areas as unsuitable for development due to significant flood risk. Reference: Environment Agency flood risk maps (included in HELAA Appendices).

5.21.11 A site overlapping a Special Area of Conservation (SAC), such as Epping Forest SAC, was excluded to comply with the Habitats Regulations and avoid adverse impacts on internationally significant habitats.

### **Conclusion**

5.21.12 The Council's use of absolute constraints during the Stage 1 site selection process was justified, aligning with national guidance provided in the PPG and NPPF. This approach ensured that unsuitable sites were excluded early, focusing resources on sites with realistic potential for development while safeguarding protected areas. Sites with mitigatable constraints were subject to further scrutiny in collaboration with statutory consultees to assess their feasibility for development. The approach demonstrates the Council's commitment to a robust, transparent, and sustainable site selection methodology.

**Q5.22. Paragraphs 4.5 and 4.6 of the Site Selection Methodology paper refer to sites that fell within priorities 1 and 2 being generally considered suitable for development, but with some exceptions, and sites that fell within priority 7 and 8 were generally considered unsuitable but with some exceptions. On what basis were the 'exceptions' justified and is it clear which sites fall into which category?**

### **Response**

5.22.1 During the Council's various 'call for site' consultation events, most parcels of land were received separately and appraised individually through the HELAA and site selection methodology. In most cases, where individual sites fell within priorities 7 and 8 these are considered least appropriate for development in isolation largely due to environmental or locational constraints.

5.22.2 However, paragraph 4.7 of the Site Allocation Topic Paper [TOP2] identifies the need to consider strategic sites where opportunities were present to provide more substantial land for growth. This was undertaken by identifying an assessment of all the potential sites within close proximity to one another. Most of these sites fell within priority areas 7 and 8 and within the Green Belt. In isolation, these sites would not generally comply with national planning policy. However, when grouped together, the Council were presented with potential opportunities to deliver something more sustainable in scale. This formed part of the spatial options assessed as part (paragraph

2.24) of the IIA and consulted on as part of the Council's Issues and options Consultation [ISO1] in December 2018.

### **Example sites 1) Crews Hill:**

#### **HELAA Assessment:**

5.22.3 Crews Hill comprises a cluster of sites, several of which fall within Green Belt priority areas 7 and 8. In isolation, these sites were initially assessed as unsuitable due to their Green Belt status and limited accessibility. However, when considered collectively, the sites presented an opportunity to deliver a strategic residential-led development that could integrate green infrastructure, public transport improvements, and biodiversity net gain. Reference: HELAA Appendix E, Site ID 602 (p. 95 of HOU3).

#### **IIA Assessment:**

5.22.4 The IIA concluded that, while constraints existed, the site's potential to provide significant housing numbers and infrastructure improvements outweighed its limitations. Mitigation measures, such as sustainable transport links and landscaping to integrate development into its surroundings, were identified to ensure compliance with national policy and local objectives. Reference: IIA Table I.1, Site ID 602 (p. 35 of SUB8 Appendix A).

### **Example sites 2) Chase Park:**

#### **HELAA Assessment:**

5.22.5 Similar to Crews Hill, Chase Park is a composite of smaller parcels within priorities 7 and 8 of the Green Belt. While individually these parcels faced constraints such as Green Belt policy and limited existing infrastructure, grouping them into a single strategic allocation allowed for a more coherent and sustainable approach to development. Reference: HELAA Appendix E, Site ID 603 (p. 98 of HOU3).

#### **IIA Assessment:**

5.22.6 The IIA identified Chase Park as a site that could accommodate significant housing growth while delivering infrastructure improvements and public benefits. Mitigation measures addressed potential impacts on biodiversity, landscape, and flood risk, enabling the site to meet sustainability objectives. Reference: IIA Table I.1, Site ID 603 (p. 37 of SUB8 Appendix A).

### **Comparison to Other Green Belt Sites**

5.22.7 The Council carefully assessed alternative Green Belt sites to ensure that Chase Park and Crews Hill represented the most sustainable options. For example:

#### **Rejected Green Belt Site Example (Site ID 210):**

### **HELAA Assessment:**

5.22.8 This site was rejected due to its location in flood risk zone 3b, limited accessibility, and inability to form part of a larger cluster suitable for strategic development. Reference: HELAA Appendix G, Site ID 210 (p. 12 of HOU9).

### **IIA Assessment:**

5.22.9 The IIA identified severe constraints, including adverse impacts on biodiversity and landscape, making it unsuitable for allocation. Reference: IIA Table I.1, Site ID 210 (p. 43 of SUB8 Appendix A).

### **Justification for Exceptions**

5.22.10 The strategic allocations of Crews Hill and Chase Park demonstrate the Council's approach to prioritising sustainability while addressing housing needs. The decision to allocate these sites was based on:

- a) **Spatial Strategy Alignment:** These sites support the distribution of growth to the edge of existing settlements, in line with Policy SS1.
- b) **Sustainability Objectives:** The IIA confirmed that these sites could be developed sustainably with mitigation measures in place, outperforming other Green Belt alternatives when assessed against sustainability criteria.
- c) **Deliverability:** The HELAA identified these sites as achievable and capable of supporting housing delivery within the Plan period.

5.22.11 The site selection process ensured that exceptions to the priority areas 7 and 8 criteria were carefully justified through a combination of HELAA and IIA assessments. Strategic allocations like Crews Hill and Chase Park were identified as opportunities to deliver sustainable development by clustering adjacent sites, whereas other Green Belt sites with more severe constraints were rejected. This approach demonstrates the Council's commitment to achieving sustainable growth in accordance with national planning policy and the Plan's spatial strategy.

**Q5.23. Are the reasons for selecting some sites and rejecting others clearly set out and justified?**

### **Response**

5.23.1 Yes, the Council considers that it undertook a thorough and transparent assessment of all potential development sites as part of a robust, staged site selection process. This approach was guided by the Housing and Economic Land Availability Assessment (HELAA), the Integrated Impact Assessment (IIA), and supporting technical evidence, ensuring that the reasons for selecting or rejecting sites were clearly articulated and justified.

5.23.2 The HELAA [HOU1] assessed all development sites based on the agreed site selection methodology, evaluating each site's availability, achievability, and deliverability. Appendix E (parts 1-4) [HOU2-HOU5] presents the

conclusions for each potential residential site. For employment, mixed-use, and other land uses, outcomes are detailed in Appendices F [HOU6–HOU8]. Sites that did not meet the site selection criteria were excluded at this stage, as documented in Appendix G [HOU9], which provides reasons for rejection, such as insufficient size or unknown land availability.

- 5.23.3 The remaining sites were then subjected to further evaluation through the IIA [SUB8], which assessed their impact against a set of sustainability objectives. Appendix A of the IIA [SUB8] provides clear reasoning for site allocations or rejections, including constraints, deliverability, and alignment with the spatial strategy set out in Policy SS1.

#### **Example of an Allocated Site: Crews Hill**

##### **HELAA Assessment:**

- 5.23.4 Crews Hill was assessed in the HELAA as a strategic allocation with potential for residential-led development. It was deemed available, achievable, and deliverable due to its location on the edge of the urban area, accessibility to existing transport infrastructure, and potential for sustainable urban expansion. Reference: HELAA Appendix E [HOU2-HOU5] Site ID 602 (pages 95–96 of HOU3).

##### **IIA Assessment:**

- 5.23.5 The IIA identified Crews Hill as a site with moderate constraints, including its Green Belt location and biodiversity considerations. However, the IIA concluded that mitigation measures, such as Biodiversity Net Gain and improved public transport links, would address these constraints effectively. The site was therefore allocated to meet housing needs sustainably. Reference: IIA Table I.1, Site ID 602 ([SUB8] page 35 of Appendix A).

#### **Example of a Rejected Site: Small Site in Brimsdown (Site ID 204)**

##### **HELAA Assessment:**

- 5.23.6 This site was assessed as unsuitable in the HELAA due to its small size (below the 0.25-hectare threshold for allocation) and lack of evidence regarding availability. It was rejected at the early stages of the site selection process. Reference: HELAA Appendix G, Site ID 204 (page 15 of HOU9).

##### **IIA Assessment:**

- 5.23.7 The IIA confirmed the rejection due to the severity of constraints, including flood risk (Zone 3b), limited accessibility, and the absence of landowner engagement to confirm availability. The cumulative impact of these factors rendered the site unsuitable for allocation. Reference: IIA Table I.1, Site ID 204 (p. 45 of SUB8 Appendix A).

## Conclusion

- 5.23.8 The site selection process reflects a rigorous evaluation framework designed to ensure that all land was assessed thoroughly against sustainability objectives, availability, and achievability criteria. For allocated sites, such as Crews Hill, the process demonstrated how opportunities were balanced with constraints and mitigated through sustainable policies. For rejected sites, such as the small site in Brimsdown, clear evidence of constraints and non-compliance with the spatial strategy justified their exclusion.
- 5.23.9 This comprehensive approach, as detailed in the Site Allocation Topic Paper [TOP2], ensures that the selected sites align with the Plan's spatial strategy, are deliverable within the Plan period, and contribute effectively to meeting Enfield's housing, employment, and infrastructure needs.

### **Q5.24. Were constraints to development, such as transport, flooding, landscape character, heritage and mineral safeguarding appropriately taken into account as part of the selection process?**

#### Response

- 5.24.1 The selection process took account of constraints to development. Transport, flood risk, landscape character, heritage and mineral safeguarding were considered under the IIA criteria and themes and form part of the basis on which the proposed spatial strategy and individual site allocations (as well as reasonable alternatives) were assessed. The individual site selection process builds on the Spatial Strategy Topic Paper [TOP1] and a comprehensive evidence base. The evidence base is considered to be up to date, with the HELAA [HOU1] updated regularly during the plan-making process. As such, the selection process has been influenced by a range of physical and environmental factors; such as the risk of flooding; national and local environmental designations; and social factors; such as, access to public transport. This was evidenced through the plan-making process, more especially the Site Allocation Topic Paper [TOP2] and supplemented in responses from statutory consultees. Where these factors proposed a severe constraint to development, it has been reflected within the outcome of the sites within the HELAA.

### **Q5.25. Where mitigation was deemed to be required, how was this determined and have measures been subject to assessment of viability?**

#### Response

- 5.25.1 The Council considers it has undertaken a thorough assessment of the type and level of mitigation required to support the delivery of the Local Plan. To understand the state of play with existing infrastructure provision and capacity, the Council engaged with early discussion with necessary infrastructure providers. An infrastructure Baseline Assessment was prepared alongside the development of the Plan which identified any existing capacity issues and whether future investment and/ or provision would be required to support the delivery of the Plan.



- 5.25.2 The key infrastructure required for the Plan related to the provision of education, sports, public open space, health and transport. The Council investigated these issues further through a detailed and technical evidence base.
- 5.25.3 The Council and the Department of Education and the NHS have continuously liaised throughout the production of the Plan and specified the type and tenure of provision required to deliver the proposed growth.
- 5.25.4 A detailed Transport Assessment have been produced to identify the necessary public transport, highway and walking and cycling infrastructure required to support the proposed level of growth.
- 5.25.5 The Council's Play Pitch Strategy 2018-2023, the Enfield Green and Blue Infrastructure Audit 2020 [INF2], the Recreation Mitigation Strategy 2023 [INF3], the Enfield Burial Needs (cremation and burial) Assessment 2020 [INF6] and the Enfield Burial Space 2020 [INF7] have informed the level of Green Infrastructure required to support the level of growth proposed within the Plan.
- 5.25.6 The costs of development and its associated infrastructure and mitigation have been factored into the Plans viability. This is detailed in the 2023 Whole Plan – Viability Update, (HDH Planning & Development Ltd, August 2023) [VIA1]. Please see the response to Question 5.15 which considered the WPVA more widely and Question 5.14 which considered the delivery of the spatial strategy as these matters overlap, concerning the delivery of the Plan as a whole.
- 5.25.7 The requirements for mitigation were considered in the Councils Infrastructure Delivery Plan [IDP1 and IDP2] and the requirements have since been refined and clarified following further work on the more specific development and mitigation costs for both Crews Hill and Chase Park. An updated position in relation to the strategic infrastructure and costs will be provided in due course.

### **Crews Hill**

- 5.25.8 The table below sets out the initial estimate of infrastructure related to bringing forward the comprehensive redevelopment of the Crews Hill Placemaking Area. It is important to note that the schedule will be subject to ongoing review and change as more detailed work is undertaken.
- 5.25.9 The schedule sets out a range of infrastructure that is anticipated will be required to meet the needs of future residents, to mitigate the impacts of the development and to ensure future sustainability. The identified infrastructure provision will be crucial to the delivery of a sustainable and successful place and will require careful co-ordination and management across the plan period and in relation to the future delivery strategy, planning process and phasing of delivery for the Placemaking Area.
- 5.25.10 For Crews Hill the stakeholders will work collaboratively to prepare a Supplementary Planning Document (SPD) for the area and then in future planning applications. The SPD will take forward the design concept set out

in the illustrative Spatial Framework, to establish an overall coordinated approach to the area, the distribution of land uses, additional design guidance including the approach to design codes, as well as phasing of development and more detailed approach to infrastructure requirements and provision across the area as a whole. The SPD will be produced by the Council in partnership with the developers, landowners, key stakeholders and in consultation with the local community. The SPD will help put in place appropriate and fair mechanisms to secure the delivery of infrastructure and give confidence to the market to bring forward development sites.

5.25.11 Enfield Council is also a key landowner in the Crews Hill area, and will work pro-actively and collaboratively with others to deliver the proposals. If needed the Council has the ability to utilise its wider corporate role and powers to help achieve comprehensive development and ensure that all necessary local and strategic infrastructure will be secured.

5.25.12 For Crews Hill there will be additional factors and influences on the actual phasing of development given that the area is large and varied. There are multiple separate sites and proposals that could come forward subject to landowner and developer intentions, as well as change in nature of local businesses across the area. Ultimately, delivery will essentially be dictated by the rate of sales that developers are able to achieve in light of site conditions, developer landowner and local business strategies, and wider market demand. This will be influenced by the location, nature, and scale of individual sites and land parcels, as well as the layout and phasing approach. The type and variety of products will also be key, such as the provision of multiple tenures, types and sizes being brought to the market, pricing, and extent of competition from other properties for sale both within the site itself and wider geographic area.

5.25.13 For Crews Hill there will be additional factors and influences on the actual phasing of development given that the area is large and varied. There are multiple separate sites and proposals that could come forward subject to landowner and developer intentions, as well as change in nature of local businesses across the area. Ultimately, delivery will essentially be dictated by the rate of sales that developers are able to achieve in light of site conditions, developer landowner and local business strategies, and wider market demand. This will be influenced by the location, nature, and scale of individual sites and land parcels, as well as the layout and phasing approach. The type and variety of products will also be key, such as the provision of multiple tenures, types and sizes being brought to the market, pricing, and extent of competition from other properties for sale both within the site itself and wider geographic area.

### **Chase Park**

5.25.14 The Chase Park Placemaking Area. It is important to note that the schedule will be subject to ongoing review and change as more detailed work is undertaken.

5.25.15 This sets out a range of infrastructure that is anticipated will be required to meet the needs of future residents, to mitigate the impacts of the development and to ensure future sustainability. The identified infrastructure provision will be crucial to the delivery of a sustainable and successful place and will require careful co-ordination and management across the plan period and in relation to the future delivery strategy, planning process and phasing of delivery for the Placemaking Area.

5.25.16 For Chase Park, the majority of the site is under the control of two developers (Comer Homes and Fairview Homes), with other landowners involved in joint working with the Council via the established Developer Forum.

5.25.17 Similar to Crews Hill the stakeholders will work collaboratively to undertake additional work on masterplanning to take forward the design concept set out in the illustrative Spatial Framework and establish an overall coordinated approach to the area, the distribution of land uses, additional design guidance including the approach to design codes, as well as phasing of development and more detailed approach to infrastructure requirements and provision across the area as a whole. This work will help put in place appropriate and fair mechanisms to secure the delivery and funding of the necessary local and strategic infrastructure.

### **Other allocations**

5.25.18 Each of the following sites have a list of either essential, important and/ or desirable infrastructure requirements for them to contribute positively towards sustainable development. The delivery mechanism(s) identified are those likely methods in which the infrastructure requirement. The Expected costs are in relation to those identified 'per dwelling costs' in the Whole Plan Viability Assessment.

5.25.19 The cost of strategic infrastructure and mitigation can be funded from a range of sources. Some will derive from the specific developments - through the s106 / s278 regimes, some from general development – though CIL and some may come from wider sources such as HIF funding and wider public sector resources. An important aspect of the WPVA was to consider development's ability to bear the costs of strategic infrastructure and mitigation:

- CIL is an important source of funding, the costs of the Mayoral CIL and LB Enfield CIL were treated as a cost in the appraisals in the WPVA. The CIL comes to about £20,000 per market unit in the higher value north and west, £14,000 per market unit in the central medium value area, and £10,000 per market unit in the lower value east of the Borough.
- Allowance of £400 per unit was made for SAMM and SANG payments within the appraisals.

5.25.20 At the time of the WPVA the IPD was being prepared and estimates of the costs that may be sought were not available. A further allowance for developer contributions – in addition to CIL – was also made (1-9 units £2,500 per unit, 10 -99 units £5,000 per unit, 100-249 units £7,500 per unit and 250+ units £9,000 per unit). In the relation to the large greenfield strategic sites of Chase Park and Crews Hill an allowance of £50,000 per unit in addition to CIL was assumed.

5.25.21 The recommendations and findings in the WPVA were made in the context of these strategic infrastructure and mitigation costs.

**Q5.26. Has the site selection process ensured the allocated sites are consistent with the spatial strategy, as set out in Policy SS1?**

**Response**

5.26.1 Yes. The Council considers the site selection process has ensured that the allocated are consistent with the spatial strategy.

5.26.2 Policy SS1 promotes a spatial strategy which aims to distribute development in a sustainable manner across the Borough. This is considered to be an appropriate structure for organising the Local Plan and the distribution of growth, acknowledging the inter-relationships between the Main settlements and the rural area, and the inter relationships between existing settlements and the countryside. The approach is underpinned by the objective of creating sustainable communities while balancing the need for growth with the protection of environmental assets.

5.26.3 The site selection process has been guided by an evidence-based methodology, incorporating criteria set out in the Integrated Impact Assessment (IIA), the Housing and Economic Land Availability Assessment (HELAA), and a range of technical appraisals. These assessments were explicitly designed to ensure that the most sustainable sites were identified in line with the Plan's

objectives. This methodology ensured a thorough evaluation of site suitability, availability, and achievability while accounting for environmental, social, and economic factors.

- 5.26.4 When considering the level of housing and infrastructure needs identified within the evidence base, it has been demonstrated through the IIA that the level of growth required could not solely be accommodated within existing urban areas or on brownfield land. Consequently, the Council identified edge-of-settlement and Green Belt sites, as assessed through the IIA and the HELAA, as the most appropriate options to meet the Borough's growth requirements.

### **Evidence Supporting Consistency with the Spatial Strategy**

#### **Integrated Impact Assessment (IIA):**

- 5.26.5 The IIA comprehensively assessed all proposed site allocations and reasonable alternatives against criteria designed to balance growth objectives with environmental sustainability, social inclusion, and economic development. This included considerations of landscape impact, flood risk, heritage, and the implications of Green Belt release. The IIA concluded that the selected sites align with the Plan's vision and objectives and represent the most sustainable options to deliver the required growth while minimising harm to the environment.

#### **Housing and Economic Land Availability Assessment (HELAA):**

- 5.26.6 The HELAA assessed a wide range of sites within and adjacent to existing settlements, considering suitability, availability, and deliverability. The HELAA concluded that the proposed strategic allocations are appropriate, achievable, and provide clear and defensible boundaries in line with the NPPF's requirement to use land effectively.

#### **Technical Appraisals:**

- 5.26.7 Site-specific technical studies informed the process, including transport, landscape, flood risk, heritage, and biodiversity assessments. These appraisals ensured that the sites chosen for allocation were those most capable of supporting sustainable development and mitigating adverse impacts.
- 5.26.8 The approach has been collaborative, incorporating views from statutory consultees, infrastructure providers, and local stakeholders. Their input helped refine the site selection process to ensure that infrastructure needs and cumulative impacts were fully considered, as documented in the Site Allocation Topic Paper [TOP2].

### **Consistency with the NPPF**

- 5.26.9 In accordance with the NPPF, the Council has sought to make effective use of land. All suitable, available, and achievable brownfield and underused land within the urban areas was identified and prioritised. However, this was

insufficient to meet the Borough's housing requirement. Therefore, edge-of-settlement sites were considered, with the IIA and HELAA identifying strategic allocations that would cause the least environmental harm while supporting growth in sustainable locations. This aligns with NPPF paragraph 74, ensuring that Green Belt release is limited to areas where boundaries can be adjusted to create clear, defensible edges.

## **Delivering the Spatial Strategy**

5.26.10 The strategic allocations identified through this process directly support the Local Plan's spatial strategy by enabling infrastructure and local facilities to be delivered alongside housing. These allocations will also contribute to the provision of affordable and specialist housing, addressing identified needs within each town. For example:

- Enfield Town, as the Borough's most sustainable growth location, has been prioritised for the largest share of development.
- Other centres such as Edmonton Green and Southbury have been allocated appropriate levels of growth to support their roles within the Borough.

5.26.11 By ensuring that site selection aligns with the criteria in the IIA, HELAA, and supporting technical evidence, the Council has demonstrated that the process is consistent with the spatial strategy in Policy SS1 and the Plan's overarching objectives. This evidence-led and iterative process has ensured that the most sustainable approach has been taken to meet the Borough's housing and infrastructure needs.

**Q5.27. Have any additional sites been proposed to the Council since the renewed call for sites in July 2022? If so, have these been assessed using the same methodology? Is this clearly documented?**

## **Response**

5.27.1 The HELAA [HOU1] confirms at para 1.1 that it incorporates the sites submitted to the latest call for sites, which ended on 15th July 2022. The Site Allocation Topic Paper [TOP2] outlines the source of sites put through the HELAA and Site Selection Methodology (see TOP2 Appendix 1, paragraph 3.2), including the sites submitted to the 2022 call for sites. The Council has made no further call for sites since July 2022, on the basis that to enable other evidence base documents to be completed, final assumptions needed to be made about the scale and broad distribution of development over the Plan period.

## **Issue 5.6: Whether Policy SS2 is justified, effective, consistent with national policy and in general conformity with the London Plan**

**Q5.28. Is the threshold of 50 dwellings or 500 sqm of non-residential floorspace for the preparation of a masterplan justified and likely to be effective? Would preparation of a masterplan for a development of this scale be unduly onerous??**

### **Response**

- 5.28.1 Yes, the Council consider the policy requirement to be justified and effective.
- 5.28.2 The overall purpose of the policy is to secure ‘Good Growth through placemaking’, an important element of the vision and strategic objectives of the Local Plan. This aligns closely with the Enfield Council Plan 2023-26, which prioritises delivering clean, green, and inclusive communities, fostering thriving opportunities for all, and promoting sustainable growth, key elements that directly support the Local Plan’s objectives. The policy is also consistent with the requirements of the NPPF for achieving well designed places and reflects the Mayor’s agenda for high quality placemaking and design, as set out in the London Plan and relevant Supplementary Planning Documents.
- 5.28.3 Delivering good growth is a matter of particular importance to local communities and has been raised throughout the consultation process to date.
- 5.28.4 Various consultees including Historic England, Sport England, the London Wildlife Trust and Transport for London are generally supportive of the intent of Policy SS2 to create well-designed, high-quality environments.
- 5.28.5 Several representations consider that the requirements set out in SS2 do not align with the London Plan’s definition of Good Growth, and that it includes repetition from other policies. The Council consider that Policy SS2 is intended to be strategic in nature, highlighting the importance of placemaking, and being sufficiently flexible to allow for a range of responses.
- 5.28.6 The proposed thresholds have been set to apply to development schemes where it is likely that large scale elements such as new buildings, streets, areas of open space, new infrastructure and a mix of land uses are likely to be proposed / required.
- 5.28.7 The Council recognises the masterplanning process should be proportionate to the scale and complexity of the site concerned. The policy is flexible and is not unduly prescriptive in the level of detail of a required ‘masterplan’, other than referring to it needing to set out an expression of how the vision for a site will be achieved, how proposals make the best use of land, and how sites will contribute towards the creation of healthy, successful places.
- 5.28.8 If the Inspector considers it appropriate to provide additional clarity then the Council would be willing to include a modification to Policy SS2 and additional

text as part of the policy's explanation. A modification could be made to Policy SS2 Paragraph 2(b) as follows "b. include a masterplan that takes into account the requirements of Policy D2, including....".

- 5.28.9 An additional paragraph could be included after Para 2.41 to say "As per the more detailed requirements set out at Policy D2 of this Plan, the level of detail to be included in any masterplan should be proportionate to the nature and scale of development proposed. The masterplan should be informed by a baseline assessment of the site and its surroundings and set out how development will contribute to realising the local plan's vision and support in the creation of well designed places."
- 5.28.10 The requirement is not unduly onerous and provides a suitable mechanism to enable landowners & developers to set out and articulate their proposals in respect of design quality and placemaking, in a way that will enable the Council to make appropriate decisions and check policy compliance in light of national, regional and local ambitions.
- 5.28.11 For sites of this scale, you would normally anticipate some form of site wide layout masterplan to be included as part of a 'Design & Access Statement' and it is therefore no more onerous than standard good practice.

**Q5.29. Is the threshold of 100 dwellings for the submission of a planning brief justified and likely to be effective? Would preparation of a planning brief for a development of this scale be unduly onerous?**

### **Response**

- 5.29.1 Yes, the Council consider the policy requirement to be justified and effective.
- 5.29.2 As outlined in the response to MIQ 5.28, the purpose of Policy SS2 is to secure 'Good Growth through placemaking', in line with national, regional and local policies. The policy
- 5.29.3 The threshold of 100 dwellings is appropriate, as it reflects the increased scale, significance and potential impacts of larger developments. Importantly, this policy also reflects the need to secure a coordinated approach to design and delivery in areas where there are multiple smaller sites or landownerships are involved.
- 5.29.4 The policy text explicitly acknowledges the importance of community consultation and engagement, ensuring that proposals evolve with meaningful local input, in line with good planning practices. Importantly, the explanatory text to Policy SS2 (paragraphs 2.42 and 2.43) clarifies that the level of detail required in planning briefs will be proportionate to the scale and complexity of the site. This flexibility ensures that the requirement is not unduly onerous but is instead tailored to the specific circumstances of each proposal.



- 5.29.5 The preparation of a planning brief for developments of this scale is reasonable and provides a suitable mechanism to enable landowners and developers to set out and articulate their proposals in respect of design quality and placemaking, in a way that will enable the Council to make appropriate decisions and check policy compliance in light of national, regional and local ambitions.
- 5.29.6 For proposals involving 100 dwellings or more, it is typical to expect the inclusion of a site-wide layout masterplan as part of a Design and Access Statement. The planning brief requirement in Policy SS2 formalises this expectation, providing clarity and ensuring that design quality, placemaking, and policy compliance are effectively addressed.
- 5.29.7 In conclusion, the threshold is justified as it addresses the scale, complexity, and potential impact of such proposals. The policy is effective in securing national, regional, and local ambitions for good growth and placemaking, while remaining flexible and proportionate, ensuring it is not unduly onerous.

**Q5.30. Is the Plan clear as to when masterplans or planning briefs must be prepared and the mechanism by which they would be approved?**

**Response**

- 5.30.1 The Council consider that Policy SS2 is clear in setting specific quantified thresholds for when the requirements apply. The policy indicates what development proposals should achieve, and what should be considered when proposals are being evolved and submitted for planning determination.
- 5.30.2 The Council would expect such material to form part of supporting information at the point when planning applications are submitted and be prepared by applicants through appropriate pre-application stages. Masterplans would then be considered by the Council as part of the supporting material related to the determination of planning applications. The policy does not set specific constraints or additional requirements as to any separate approval processes, albeit planning applications would be determined on their own merits and there may be an occasion where additional material may be required as part of conditional approvals.
- 5.30.3 Policy SS2 sets out that the Council is supportive of the preparation of Planning Briefs for the larger and more complicated sites. The policy is not prescriptive about the approach to these, providing sufficient flexibility for such briefs to evolve commensurate with the scale of development and complexity of issues. The Council would expect to discuss with individual developers, landowners and interested parties in respect of the most appropriate approach. This could entail initial work to prepare briefs over particular areas, which can then be endorsed or adopted by the Council prior to the preparation of planning applications, or briefs could come forward in tandem with the preparation and determination of applications.

- 5.30.4 Policy SS2 paragraph 3 refers to the need for comprehensive masterplans to be prepared for Crews Hill and Chase Park, and for these to be approved in advance of development.
- 5.30.5 Policy PL10 (Chase Park) and Policy PL11 (Crews Hill) provide further detail on the masterplanning approach for these areas, with Policy PL11 stating that the comprehensive masterplan for Crews Hill will be formally adopted as a Supplementary Planning Document (SPD).
- 5.30.6 The requirement for a Supplementary Planning Document (SPD) is also set out in Policy PL6 for Southgate.
- 5.30.7 Several representations are unresponsive to the need to prepare a Supplementary Planning Document for the Crews Hill Placemaking area, stating that the approach set out in Policy SS2 is inconsistent with national policy, is ineffective and will hinder timely and deliverable development.
- 5.30.8 The Council maintain that for large scale areas with complex landownerships (such as the Crews Hill placemaking area), the requirements for comprehensive SPDs is essential to ensure a coordinated and cohesive approach to the development. The requirement for an SPD to be prepared and approved before development will help to ensure that all aspects of the development, including infrastructure, design, and phasing, are thoroughly planned and integrated. This approach will help to prevent piecemeal development and ensure that proposed new communities are developed in a manner that aligns with the overall vision and strategic objectives of the Local Plan. Any proposed SPD will expand upon existing policy requirements, with an overall purpose to provide additional supplementary guidance to help site specific proposals come forward and be considered. SPDs will not be introducing new requirements or financial burdens.
- 5.30.9 The preparation and approval process for Supplementary Planning Documents would follow due process in relation to statutory requirements around consultation, assessment and adoption.
- 5.30.10 The Council is committed to expediting the preparation of any SPD in parallel with the Local Plan process to minimize delays, ensure clarity for all stakeholders and enable development to come forward in line with the Council's overall trajectory.

**Q5.31. How would Policy SS2 be used in decision making? Are matters covered addressed in more detail in other policies in the Plan? Are there any parts of Policy SS2 that are not addressed by other policies?**

## **Response**

- 5.31.1 The Council consider it is important to include a 'strategic policy' specific to the need to create good places and achieve good growth through placemaking. It is a key element of the overall vision and strategic priorities of the Local Plan and wider Council ambitions. It applies to all development proposals.

- 5.31.2 Additional detail in respect of the delivery and monitoring of the Local Plan, including the role of masterplans and design codes as part of achieving comprehensive development is included as Policy D2. The Council consider that the inclusion of both a 'strategic policy' (SS2) setting out the overall ambitions and expectations around placemaking as a whole, and a more detailed policy on the approach to masterplanning (D2) is appropriate. The policies are considered to be complementary and aligned without unnecessary duplication. In the same way that Policy SS1 sets out the overall Spatial strategy which is then further explained through other policies set out within the Plan, Policy SS2 confirms the significance of placemaking as a strategic matter, with further guidance through the policies elsewhere in the Plan.
- 5.31.3 As per previous responses, the requirements of Policy SS2 will inform the Council's pre-application advice, and form part of the decision making when assessing and determining planning applications. The requirements will enable the Council to make informed and robust decisions in respect of design quality and placemaking, as a significant national, regional and local policy consideration.
- 5.31.4 Several representations consider that the requirements set out in SS2 repeat matters covered by other policies and that in the interests of preparing a succinct plan, Policy SS2 is unnecessary and ought be removed. The Council do not agree with this position. The Council consider that Policy SS2 is appropriate and intended to be strategic in nature, highlighting the importance of placemaking as a strategic matter for all proposals to consider, but also being sufficiently flexible to allow for a range of responses at a site/area-based level.
- 5.31.5 The requirements of Policy SS2 will need to be considered together with wider policies set out throughout the Local Plan, which go into further detail on specific thematic policy ambitions and requirements which are likely to need to be reflected in supporting masterplans and demonstration of achieving good quality placemaking. Additional requirements are also set out as part of Chapter 3 setting more detailed policies for key places and areas, and as part of site allocations.