



Enfield Council

Enfield Local Plan Integrated Impact Assessment

Final report

Prepared by LUC

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Enfield Council

Enfield Local Plan
Integrated Impact Assessment

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Chapter 1

Introduction

1.1 Enfield Council commissioned LUC in March 2021 to carry out an Integrated Impact Assessment (IIA), comprising Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA), Community Safety Impact Assessment (CSIA) and Habitats Regulations Assessment (HRA), of the Enfield Local Plan: Main Issues and Preferred Approaches. As explained later in this chapter, the SA, SEA, HIA, EqIA and CSIA have been undertaken together as part of the IIA. Therefore, for simplicity within this report we mostly refer just to the IIA, which should be taken as incorporating SA, SEA, HIA, EqIA and CSIA.

The Local Plan area

1.2 The London Borough of Enfield (LBE) lies within the north of Greater London (see **Figure 1.1**) and is home to approximately 333,000 people and 130,000 households. The Borough sits entirely within the M25, north of the River Thames. Central London is approximately 15 miles to the south. LBE shares boundaries with three other London Boroughs: Waltham Forest to the east, Haringey to the south and Barnet to the west. Enfield Borough adjoins the counties of Hertfordshire and Essex to the north and east, respectively. It is also positioned within the London-Stansted-Cambridge Innovation Corridor.

1.3 LBE is faced by a significant number of planning constraints, specifically the Green Belt which covers 3,000ha (37%) of the Borough, Metropolitan Open Land which covers 249.07ha of the Borough and over 400ha of industrial land, of which approximately 326ha is classified as Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). There are also a number of environmental constraints towards the east of the Borough.

Outline of the Local Plan and its objectives

1.4 The new Enfield Local Plan will cover the period to 2039 and replace the Council's current suite of development plan documents, bringing the updated policies together into one single plan. The Council's current suite of development plan documents comprises the Core Strategy (2010), Development Management Document (2014), and Area Action Plans for the North Circular Road (2014), North East Enfield (2016) and Edmonton Leaside (2020). The new Local Plan will address local housing need, the economy, environmental considerations including the climate emergency, community infrastructure as well as strategic infrastructure needs and will assist the Council in its move towards carbon neutrality. The Plan will make site specific allocations to meet identified needs of the future. Once the Council has fully engaged with the local community and the Plan has been through all of its formal statutory stages, it will be adopted as the development plan for the Borough and used to assess planning applications.

1.5 Enfield Council undertook a preliminary consultation with local communities on the emerging Local Plan between December 2015 and February 2016. Then, between December 2018 and February 2019, the Council consulted upon the Issues and Options version of the Local Plan as part of the Regulation 18 stage of plan preparation. This initial Regulation 18 document focused on exploring broad issues and options but did not indicate the Council's preferred approach in terms of the scale of growth to be planned for nor the proposed spatial strategy. The Council has now prepared the 'Enfield Local Plan: Main Issues and Preferred Approaches' document, which is the subject of the current consultation, also part of the Regulation 18 stage. The purpose of this consultation is for the Council to test and refine its approaches, gain feedback on the scope of the new Local Plan, its strategic objectives, the main planning issues and opportunities in LBE, and the possible policy approaches to address these before making a decision on the plan it wishes to take to the next stage of the plan making process. The Council also want to learn if there are any issues, opportunities or policy alternatives that have not yet been identified, but which should be considered.

1.6 The Enfield Local Plan: Main Issues and Preferred Approaches document comprises the following main components:

- Spatial vision setting out what Enfield will be by 2039 and underpinned by four guiding themes. Further detail is then provided by 20 strategic objectives.

- 36 strategic policies (including 10 place policies) and 57 development management policies across the following topics:
 - Good growth in Enfield;
 - Places;
 - Sustainable Enfield;
 - Addressing equality and improving health and wellbeing;
 - Blue and green Enfield;
 - Design and character;
 - Homes for all;
 - Economy;
 - Town centres and high streets;
 - Rural Enfield;
 - Culture, leisure and recreation;
 - Movement and Connectivity;
 - Environmental protection; and
 - Delivering and monitoring.

1.7 Since consulting on the Issues & Options version of the Local Plan (2018-2019), the Council has declared a climate emergency (in July 2020) and is committed to becoming a carbon neutral organisation by 2030 and a carbon neutral Borough by 2040. All services across the Council have an important part to play and the Local Plan has a key role in helping to reduce carbon emissions. In this respect, it must be recognised that the Local Plan is only one of the tools that will support a reduction in carbon emissions across the Borough. It cannot achieve this on its own as the Local Plan is primarily a land use document and any proposed policies need to comply with the Government requirements on for example, the number of houses that need to be built in the Borough. Nonetheless, the target of achieving carbon neutrality must be central to the Local Plan-making process and the IIA.

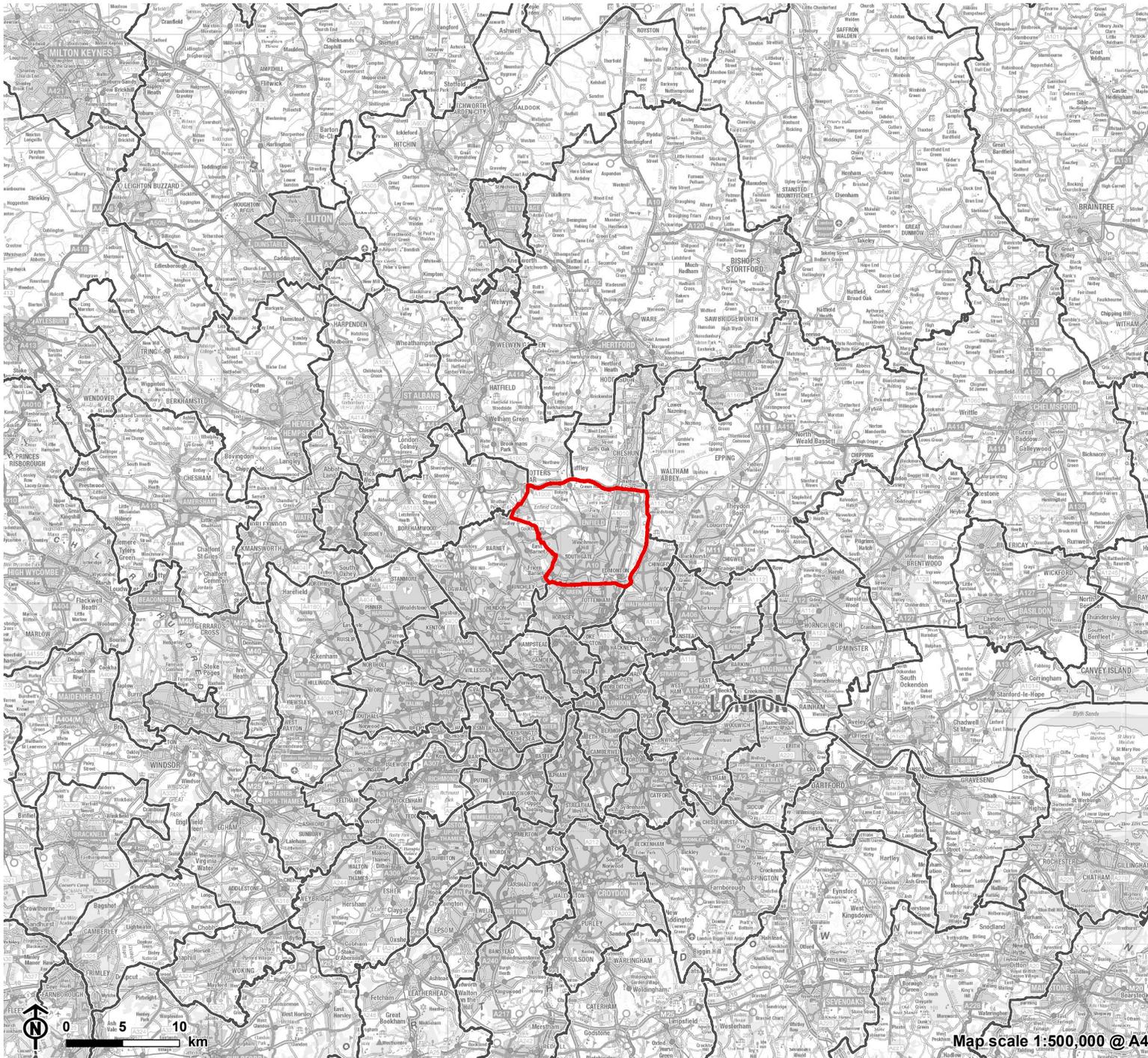


Figure 1.1: London Borough of Enfield

- London Borough of Enfield boundary
- Other local authority boundary

Sustainability Appraisal and Strategic Environmental Assessment

1.8 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). As set out in the explanatory Memorandum accompanying the Brexit amendments, they are necessary to ensure that the law functions correctly following the UK's exit from the EU. No substantive changes are being made by this instrument to the way the SEA regime operates. Therefore, the SEA regulations remain in force and it is a legal requirement for the Enfield's Local Plan to be subject to SA and SEA throughout its preparation.

1.9 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the Government's Planning Practice Guidance¹), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA/SEA process – this is the process that is being undertaken for the Enfield Local Plan, and within this report the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Regulations'. In addition to SA/SEA, further impact assessments are being carried out on the Enfield Local Plan as described below, therefore, instead of 'SA' and 'Sustainability Appraisal Report', the term Integrated Impact Assessment and IIA are being used in this report.

1.10 The SA process comprises a number of stages, as shown below.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal (or 'IIA') Report.

Stage D: Consulting on the Local Plan and the SA (IIA) Report.

Stage E: Monitoring the significant effects of implementing the Local Plan.

Health Impact Assessment

1.11 Although not a statutory requirement, Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. Sustainability objectives that address health issues have been included as part of the IIA process and in this way the HIA of the Enfield Local Plan is being carried out as part of the IIA. Recommendations will be made in relation to how the health-related impacts of the Local Plan can be optimised as the options are developed into detailed policies and site allocations.

Equalities Impact Assessment

1.12 The requirement to undertake formal Equalities Impact Assessment (EqIA) of development plans was introduced in the Equality Act 2010 but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.

1.13 In fulfilling this duty, many authorities still find it useful to produce a written record of equality issues having been specifically considered. Therefore, an EqIA is being carried out as part of the IIA, setting out how the Local Plan is likely to be compatible or incompatible with the requirements of the Equalities Act 2010.

Community Safety Impact Assessment

1.14 The purpose of the Community Safety Impact Assessment (CSIA) will be to ensure that the Local Plan vision, objectives, policies and sites do not have a detrimental impact on community safety and, where possible, improve the existing situation.

¹ Ministry of Housing, Communities and Local Government (last updated 1 October 2019) Planning Practice Guidance: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>.

1.15 The CSIA will be undertaken in accordance with the requirements of the Crime and Disorder Act 1998 and the Police and Justice Act 2006, as amended, and will fulfil the requirement to carry out a review of the levels and patterns of crime, disorder and community safety in the area when developing a strategy or plan.

Habitats Regulations Assessment

1.16 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007². The currently applicable version is 'The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579)³ (hereafter referred to as the 'Habitats Regulations'). When preparing the Local Plan, the Council is therefore required by law to carry out an HRA, and because it is a separate legal requirement to the SA/SEA, it is being undertaken and reported separately from the IIA.

1.17 The Council can commission consultants to undertake HRA work on its behalf (and LUC has been commissioned to do the HRA) and the work documented in separate HRA reports is then sent to and considered by the Council as the 'competent authority'. The Council will consider the HRA and may only progress the Local Plan if it considers that it will not adversely affect the integrity of any European site or have a significant effect on qualifying habitats or species for which the European sites are designated for, or if Imperative Reasons of Overriding Public Interest (IROPI) are identified. The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance (PPG)⁴.

Meeting the requirements of the SEA Regulations

1.18 Table 1.1 signposts the relevant sections of the IIA Report that are considered to meet the SEA Regulations requirements. This table will be included in the IIA Report at each stage of the IIA to show how the requirements of the SEA Regulations have been met through the IIA process.

1.19 SEA Guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline and forthcoming reports, these are highlighted in the text. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the IIA process as and when data are published.

Structure of the IIA Report

1.20 This chapter describes the background to the production of the Enfield Local Plan as well as its contents and the requirement to undertake SA and other assessment processes. The remainder of this IIA Report is structured into the following chapters:

- **Chapter 2** describes the approach that is being taken to the IIA of the Enfield Local Plan.
- **Chapter 3** describes the relationship between the Enfield Local Plan and any other relevant plans, policies and programmes; summarising the social, economic and environmental characteristics of the Borough and identifying the key sustainability issues.
- **Chapter 4** presents the IIA findings for the Enfield Local Plan vision, objectives and strategic policies SP SS1 and SP SS2 from Chapter 2 in the Enfield Local Plan.
- **Chapter 5** presents the IIA findings for the Place policies from Chapter 3 in the Enfield Local Plan.

² The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.

³ The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London.

⁴ UK Government (2019) Guidance: Appropriate assessment [online] Available at: <https://www.gov.uk/guidance/appropriate-assessment>

- **Chapter 6** presents the IIA findings for the strategic and development management policies from Chapters 4 to 15 in the Enfield Local Plan.
- **Chapter 7** describes the potential cumulative effects of all the policies and site allocations in the Enfield Local Plan.
- **Chapter 8** summarises the potential monitoring framework and indicators that could be used.
- **Chapter 9** summarises the conclusions and next steps for the IIA process.

1.21 A separate volume of Appendices has also been prepared as follows:

- **Appendix A** reproduces the AECOM 2020 IIA Scoping Report.
- **Appendix B** sets out the assumptions used in determining significant effects for the site options and allocations.
- **Appendix C** presents the IIA findings for the Enfield Local Plan Issues and Options 2018.
- **Appendix D** presents the IIA findings for the spatial strategy options 2021.
- **Appendix E** presents the IIA findings for the site options 2021.
- **Appendix F** presents the audit trail of the Council's site selection process 2021.

Table 1.1: Meeting the requirements of the SEA Regulations

SEA Regulations requirements	Where covered in this report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):	
a. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 3 and Appendix A.
b. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	
c. The environmental characteristics of areas likely to be significantly affected.	
d. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
e. The environmental protection, objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	
f. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Chapters 4, 5 and 6, and Appendix C.
g. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Chapters 4, 5 and 6, and Appendix C.

SEA Regulations requirements	Where covered in this report
<p>h. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<p>Chapters 2, 4, 5 and 6, and Appendices B, C, D and E.</p>
<p>i. A description of measures envisaged concerning monitoring in accordance with Reg. 17.</p>	<p>Chapter 8.</p>
<p>j. A non-technical summary of the information provided under the above headings.</p>	<p>Requirement will be met at the next (Reg. 19) stage.</p>
<p>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).</p>	<p>Addressed throughout this IIA Report.</p>
<p>Consultation requirements</p>	
<p>■ Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)).</p>	<p>Consultation on the IIA Scoping Report was undertaken early 2020.</p>
<p>■ Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).</p>	<p>Consultation is being undertaken in relation to the Reg. 18 Local Plan between 21 June 2021 and 13 September 2021.</p>
<p>■ Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</p>	<p>Unlikely to be relevant to the Reg. 19 Local Plan, as there will be no effects beyond the UK.</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</p>	
<p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> ■ the plan or programme as adopted; ■ a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and ■ the measures decided concerning monitoring. 	<p>To be addressed after the Local Plan is adopted.</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg. 17).</p>	<p>Requirement will be met after adoption of the Local Plan.</p>

SEA Regulations requirements	Where covered in this report
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.	This report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Regulations have been met.

Chapter 2 Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the IIA of the Enfield Local Plan is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance. This calls for the IIA to be carried out as an integral part of the plan-making process and **Figure 2.1** sets out the main stages of the plan-making process and shows how these correspond to the SA/SEA (in this case IIA) process.

Figure 2.1: Corresponding stages in plan making and SA/SEA (in this case IIA)

Local Plan Step 1: Evidence Gathering and Engagement
SA/IIA Stages and Tasks
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope <ol style="list-style-type: none"> 1. Identifying other relevant policies, plans and programmes, and sustainability objectives 2. Collecting baseline information 3. Identifying sustainability issues and problems 4. Developing the SA/IIA Framework 5. Consulting on the scope of the SA/IIA
Local Plan Step 2: Production
SA/IIA Stages and Tasks
Stage B: Developing and refining options and assessing effects <ol style="list-style-type: none"> 1. Testing the Local Plan objectives against the SA/IIA Framework 2. Developing the Local Plan options 3. Evaluating the effects of the Local Plan 4. Considering ways of mitigating adverse effects and maximising beneficial effects 5. Proposing measures to monitor the significant effects of implementing the Local Plan
Stage C: Preparing the Sustainability Appraisal (or IIA) Report <ol style="list-style-type: none"> 1. Preparing the SA/IIA Report
Stage D: Seek representations on the Local Plan and the Sustainability Appraisal (or IIA) Report <ol style="list-style-type: none"> 1. Public participation on Local Plan and the SA/IIA Report 2. (i) Appraising significant changes
Local Plan Step 3: Examination
SA/IIA Stages and Tasks
Stage D (cont.) <ol style="list-style-type: none"> 2. (ii) Appraising significant changes resulting from representations
Local Plan Step 4 & 5: Adoption and Monitoring

SA/IIA Stages and Tasks
Stage D (cont.) 3. Making decisions and providing information
Stage E: Monitoring the significant effects of implementing the Local Plan 1. Finalising aims and methods for monitoring 2. Responding to adverse effects

Stage A: Scoping

2.2 The IIA process began with the production of an IIA Scoping Report for the Local Plan, prepared by AECOM (May 2020). The Scoping stage of the IIA involves understanding the social, economic and environmental baseline for the Plan area, as well as the sustainability policy context and key sustainability issues.

Review other relevant policies, plans and programmes to establish policy context

2.3 The Local Plan is not prepared in isolation; rather it is prepared within the context of other policies, plans and programmes. The SEA Regulations require the Environmental Report to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support attainment of sustainability objectives that have been established at the international, national and regional/sub-regional levels.

2.4 The IIA Scoping Report contains a review of relevant policies, plans and programmes at the national, regional and local levels that were considered to be relevant to the scope of the Local Plan. The IIA Scoping Report, which contains this review, is presented in **Appendix A**. A summary of the relevant international and national level policies, plans and programmes is provided in **Chapter 3**.

Collect baseline information to establish sustainability context

2.5 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the IIA and monitored during the plan's implementation. Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the local plan to understand the likely future sustainability conditions in the absence of the local plan.

2.6 The SEA Regulations require the Environmental Report (in this case the IIA report) to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of this likely future, together with the assessed effects of the plan itself, additionally allows the IIA to report on cumulative effects, another requirement of the SEA Regulations.

2.7 The SEA Regulations require assessment of effects in relation to the following 'SEA topics': biodiversity, population, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these. Baseline information was therefore collected in relation to the SEA topics and additional sustainability topics were also addressed, covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the SA, SEA and other impact assessment processes. Baseline information for the Borough was presented in the IIA Scoping Report produced by AECOM (see **Appendix A**). Any updates since the publication of the Scoping Report have been reflected in **Chapter 3** of this IIA Report.

Identify sustainability issues

2.8 The baseline information also allows the identification of existing sustainability issues, including problems as required by the SEA Regulations. The sustainability issues and their likely evolution without the Local Plan were initially presented in the IIA Scoping Report (**Appendix A**) but have since been updated and are presented in **Table 3.1** of this IIA Report.

Develop the IIA framework

2.9 The relevant sustainability objectives identified by the review of other policies, plans and programmes together with the key sustainability issues facing the Borough, identified by the collection and review of baseline information in the IIA Scoping Report, informed the development of a set of sustainability objectives (the 'IIA framework') against which the effects of the Plan would be assessed. These objectives also take into account the types of issues that are capable of being affected by the land use planning system. LUC has reviewed these objectives and made some refinements to the original IIA framework.

2.10 Development of an assessment framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The IIA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan. An explanation of the development of the IIA framework for the Enfield Local Plan is provided further ahead in this chapter and the IIA framework is presented in **Table 3.2**.

Consult on the scope and level of detail of the IIA

2.11 Public and stakeholder participation is an important part of the IIA and wider plan-making processes. It helps to ensure that the IIA report is robust and has due regard for all appropriate information that will support the Plan in making a contribution to sustainable development.

2.12 The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England and Natural England) to be consulted "*when deciding on the scope and level of detail of the information that must be included*" in the IIA Report. The scope and level of detail of the IIA is governed by the IIA framework and the statutory consultees have therefore been consulted on this when it was developed as part of the scoping process for the IIA Report. The Council undertook some pre-engagement with the statutory consultees before formal consultation on the IIA Scoping Report was undertaken in early 2020.

2.13 Appendix A contains the IIA Scoping Report (May 2020) and the comments that were received during this period of consultation. In light of the comments received, AECOM made some amendments to the review of policies, plans and programmes, the baseline information, key sustainability issues, the IIA framework and the IIA assumptions.

2.14 It should be noted that LUC has since reviewed the IIA framework before carrying out assessment of the current Regulation 18 Local Plan, and made some further minor revisions, as described later in this chapter, and shown in **Table 3.2**.

Stage B: Developing and refining options and assessing effects

2.15 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the IIA help to identify where there may be 'reasonable alternatives' to the options being considered for a plan.

2.16 In relation to the IIA report that needs to be prepared for the Enfield Local Plan, Part 3 of the SEA Regulations 12 (2) requires that:

"The (environmental or SA/IIA) report must identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."

2.17 Schedule 2 (h) of the SEA Regulations requires that the Environmental (or SA/IIA) Report includes a description of:

"(h) an outline of the reasons for selecting the alternatives dealt with"

2.18 The SEA Regulations therefore require that when considering the policies and site allocations for inclusion in a plan, any alternative policy approaches or site options that are 'reasonable' must be subject to appraisal. Therefore, alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that

do not meet the objectives of the plan or national policy (e.g. the NPPF) or site allocation options that are unavailable or undeliverable.

2.19 The IIA findings are not the only factors taken into account when plan-makers are determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the IIA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for the plan.

2.20 The consideration of reasonable alternatives has been a key focus of attention within the IIA process. This section provides an overview of how policy and site options have been identified by Enfield Council, which ones are 'reasonable alternatives and therefore been subject to IIA, and how this appraisal work has fed into the development of Enfield's Local Plan.

2015-17 Early Issues and Options (Regulation 18)

2.21 An early Issues and Options consultation was undertaken by Enfield Council in 2015-16 which sought residents' views on the priorities for future growth in the Borough, including five options (do nothing, infill and intensify, optimise growth corridors, existing Green Belt settlements and industrial land release). This was an early opinion-seeking consultation only and the SA/IIA process had not yet commenced. The 2018 Issues and Options document notes that the 2015-16 consultation highlighted clear concerns about what would happen if growth was not properly managed and accommodated, including:

- overcrowding and a lack of truly affordable housing;
- a lack of high quality health care facilities and other infrastructure provisions to cope with the increases in population; and
- increasing inequalities between different areas of the Borough and about development pressures on green spaces.

2.22 In 2017, the Council undertook another consultation exercise, the 'Enfield Conversation', which highlighted further local concerns and priorities. The Enfield Conversation engaged a wider mix of residents beyond those traditionally engaged in the plan making process, through a series of residents' workshops. The discussions during the workshops found:

- building homes in the Upper Lee Valley remained the most popular spatial choice followed by the town centres, the A10 corridor and on Council estates;
- there was some support for low density housing in the Green Belt but the general view was that high-density apartments would be the most efficient way of delivering more housing; and
- there was concern that more housing would not be matched by the appropriate supporting infrastructure.

2018 Issues and Options (Regulation 18)

2.23 Enfield Council prepared and consulted on a Regulation 18 Issues and Options document from December 2018 to February 2019. This document focussed on exploring broad issues and options but did not indicate a preferred approach, in terms of the scale of growth to be planned for, or in terms of a spatial strategy. Drawing on the outcomes of the early 2015-17 consultation and taking into account strategic priorities at the time and the NPPF, in the 2018 Issues and Options Local Plan, Enfield Council identified seven broad strategic growth options (for distributing housing and employment development across the Borough – see below) and a series of high level policy options. The policy options fell into the following broad themes: historic environment, design, housing, economy, town centres, social infrastructure, green infrastructure, transport and sustainable infrastructure.

2.24 The seven broad strategic growth options in the 2018 Issues and Option document were as follows:

- Option 1: Main town centres and areas around all stations;
- Option 2: Transport corridors;
- Option 3: Existing estate renewal and regeneration programmes;
- Option 4: Eastern corridor and low density industrial areas;
- Option 5: Future Crossrail 2 Growth Corridor;

- Option 6: The New Southgate and Upper Lee Valley Opportunity Areas; and
- Option 7: Strategic plan-led approach to Green Belt.

2.25 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 document are presented in **Appendix C**.

2021 Main Issues and Preferred Approaches (Regulation 18)

2.26 Enfield Council has been working on a further Regulation 18 consultation document, which it considers necessary in order to:

- Explore issues identified through the earlier Regulation 18 consultation.
- Respond to changes in government planning policy, the climate and nature emergencies, COVID-19, and the recently adopted London Plan.
- Reflect the new and updated evidence base.
- Identify a preferred spatial growth strategy and preferred policy options.

2.27 The 2021 Enfield Local Plan: Main Issues and Preferred Approaches is considered to be an advancement on the 2018-19 Issues and Options consultation. Although the draft Plan still discusses issues and presents some spatial and policy options, it now identifies a preferred option.

Spatial strategy options

2.28 Discussions were held between Enfield Council and the IIA team regarding the spatial strategy options for distributing the different levels of growth that may be required during the Plan period (under a baseline, medium and high growth scenario as described in the Draft Local Plan). Various options have been considered by Enfield Council and the IIA team helped to determine which were reasonable alternatives and should be subject to IIA, as shown in **Table 2.1**. Note there are a few more options presented in this table than in Table 2.2 of the Draft Local Plan as some options were identified but discounted quickly by the Council as not being realistic, nevertheless, they are still considered to represent 'reasonable alternatives' in IIA terms, hence their inclusion in this IIA Report. The IIA findings relating to these spatial strategy options are presented in **Appendix D**.

2.29 The Council's reasons for selecting the preferred option (Medium growth in the urban area with some Green Belt release) are summarised in the third column in **Table 2.1**, along with the reasons for discounting the other options.

Table 2.1: Reasonable alternative spatial options considered during preparation of the Regulation 18 Enfield Local Plan

Spatial strategy options considered, as described in IIA Report	Appraised as reasonable alternative in IIA Report?	Enfield Council's reason for selecting or discounting the option
<p>Option 1A: Baseline growth</p> <p>This is based on accommodating 17,000 new homes with some other land uses, including limited nature recovery and green and blue infrastructure improvements. Growth is distributed in the urban only.</p>	Yes	<p>Discounted because it will not meet the required housing need that must be planned for, and would not deliver the mix of housing types needed (as it would require mostly flats in tall buildings).</p> <p>Other land uses requirements will not be met.</p>
<p>Option 1B: Baseline growth</p> <p>Similar to Option 1A, growth is distributed in the urban area and employment areas.</p>	Yes	<p>Discounted because it will not meet the required housing need that must be planned for, would not deliver the mix of housing types needed, and would require limited use of Strategic Industrial Locations (SILs) i so would not be in conformity with the London Plan.</p> <p>Other land use requirements not met.</p>

Spatial strategy options considered, as described in IIA Report	Appraised as reasonable alternative in IIA Report?	Enfield Council's reason for selecting or discounting the option
<p>Option 2A: Medium growth</p> <p>This is based on accommodating approximately 25,000 new homes in the urban area and employment areas.</p>	Yes	<p>Discounted because it would not deliver the mix of housing types needed and would require use of SILs so would not be in conformity with the London Plan.</p> <p>Other land use requirements not met.</p>
<p>Option 2B: Medium growth</p> <p>This is based on accommodating approximately 25,000 new homes with a full range of land uses, including extensive nature recovery and green and blue infrastructure investment with growth distributed in the urban area, employment areas and some release of the Green Belt.</p>	Yes	<p>Discounted because it would not deliver the mix of housing types needed, would require use of SILs so would not be in conformity with the London Plan, and Green Belt release which may be contrary to the NPPF.</p> <p>Other land use requirements not met.</p>
<p>Option 2C: Medium growth</p> <p>Similar to Option 2B, this option looks to accommodate 25,000 new homes, largely focused in the urban area some release of Green Belt. Growth is largely focused in the seven urban placemaking areas and the two rural placemaking areas. A zoning approach is taken to most of the rural areas to facilitate development of multi-layered mosaic of sustainable rural land uses and creation of National Park city designation area. No release of SIL.</p>	Yes	<p>Selected as Preferred Option because it would meet the required housing need that must be planned for and mix of housing types. Although it involves some limited Green Belt release, it would not require use of SILs.</p> <p>Other land use requirements met in full or close to full.</p> <p>Positive enhancements to existing employment areas.</p>
<p>Option 2D: Medium growth</p> <p>Similar to Options 2B and C, this option looks to accommodate 25,000 new homes, but focused in the urban area only.</p>	Yes	<p>Discounted because it will not meet the required housing need that must be planned for and would not deliver the mix of housing types needed (as it would require mostly flats in tall buildings).</p> <p>Other land use requirements not met.</p>
<p>Option 3A: High growth</p> <p>This option is based on accommodating 55,000 homes, largely delivered in the urban area only.</p>	Yes	<p>Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed.</p>
<p>Option 3B: High growth</p> <p>Similar to Option 3A, but the focus is in the urban area and employment areas.</p>	Yes	<p>Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed. It would also require significant use of SILs contrary to London Plan policy.</p>
<p>Option 3C: High growth</p> <p>Similar to options 3B and C, this is widespread growth across the Borough</p>	Yes	<p>Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed. It would also</p>

Spatial strategy options considered, as described in IIA Report	Appraised as reasonable alternative in IIA Report?	Enfield Council's reason for selecting or discounting the option
including the urban area, employment areas and the Green Belt.		require significant use of SILs and Green Belt release contrary to London Plan policy and the NPPF.
Option 3D: High growth Similar to Option 3A, growth is focused in the urban area and Green Belt.	Yes	Discounted because it would result in very high density development and tall buildings in the urban area resulting in significant change to the Borough's character and not deliver the mix of housing types needed. It would also require significant Green Belt release contrary to the NPPF.
Option 4: seeking to accommodate most growth outside the Borough.	No – not a reasonable alternative as it is outside the geographical scope of the Local Plan	Discounted because none of the neighbouring authorities were willing to take Enfield's housing and other land use requirements and the Borough would be likely to suffer decline or stagnation and be unable to lever in investment and infrastructure improvements etc.
Option 5: seeking to accommodate most of the development in the urban area to the east of the A10.	Yes	Discounted because it would result in very high density development and tall buildings in the urban area east of the A10 and would not meet the housing need or deliver the mix of housing types needed. It would also require significant use of SILs contrary to London Plan policy. It would not be able to address inequality and east/west imbalances and there could be stagnation of western areas in the Borough.
Option 6: seeking to accommodate majority of development in the urban area to the west of the A10.	Yes	As for Option 5 but could result in stagnation of eastern areas rather than western.

Site options

2.30 As set out in the Council's Site Selection Methodology⁵, the Council identified potentially available and suitable reasonable alternative site options as part of its Housing and Employment Land Availability Assessment (HELAA) from various sources, including:

- Recent planning applications.
- Enfield's 2021 Call for sites.
- Enfield's 2019 - 2020 Call for Sites and Call for Small Sites.
- Existing Development Plan Allocations and Opportunity Sites not yet completed.
- Sites with development briefs and/or developer masterplans.
- The most recent London Strategic Housing Land Availability Assessment (SHLAA) 2017.
- Areas of search identified in the Enfield Industrial Intensification Study.
- The GLA's London Development Database.

⁵ Site Selection Methodology, Enfield Council, 2021.

- Enfield Annual Monitoring Reports.
- Enfield Housing Trajectory.
- Enfield Brownfield Land Register.
- Sites identified through Neighbourhood Plans in Enfield.

2.31 All sites were then subject to the assessment process set out in the Site Selection Methodology document by the Council to determine whether they were available, suitable and achievable in order to determine how deliverable each site could be. The following categories were then applied to each site:

- Sites classified as 'deliverable' or 'developable' may be expected to be developed within the next 15 years.
- Sites classified as 'potentially developable' comprise a basket of sites from which some might be deemed developable following further consideration through the local plan process.
- Sites classified as 'not developable within the next 15 years' cannot realistically be expected to be developed in the foreseeable future and are not considered further in the local plan process.

2.32 The HELAA identified a large number of sites (around 600) and explains “*It is important to note that the sites in the HELAA are NOT allocated for development. It is the role of the assessment to provide information on the range of sites that are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.*”

2.33 All sites were then put through the remaining stages of the Site Selection Methodology (stages 2-6) by the Council to determine their suitability for allocation in the Local Plan. The Site Selection Methodology involved six stages as shown in **Table 2.2**.

Table 2.2: Enfield Council Site Selection Methodology Overview

Site Selection Stage	Tasks involved
Stage 1: Identification and initial sift of sites	<ul style="list-style-type: none"> ■ Stage 1a: Identification of sites ('deliverable and potentially developable' from HELAA). ■ Stage 1b: Assessment of absolute constraints. ■ Stage 1c: Size threshold (50 homes+ or 0.25ha / 500sqm or 0.25ha).
Stage 2: Promoting a Sustainable Pattern of Development	<ul style="list-style-type: none"> ■ Stage 2: Sites considered on a sequential approach directing growth to specific locations, based on the overall hierarchy which: <ul style="list-style-type: none"> – Prioritises land in the urban area; then – Prioritises brownfield land in the Green Belt; then – Prioritises lower performing land in the Green Belt.
Stage 3: Detailed Planning Assessment	<ul style="list-style-type: none"> ■ Stage 3a: Consideration of technical constraints (e.g. highways). ■ Stage 3b: Consideration of other non-absolute constraints (e.g. historic/ecological etc.).
Stage 4: Integrated Impact Assessment	<ul style="list-style-type: none"> ■ Stage 4: Identify any significant negative effects that may require mitigation if site is put forward for allocation. <i>[The results of the IIA of site options are set out in Appendix E.]</i>
Stage 5: Deliverability	<ul style="list-style-type: none"> ■ Stage 5: Does the evidence indicate that the site could be delivered within the plan period?
Stage 6: Overall Conclusion	<ul style="list-style-type: none"> ■ Stage 6: Identification of preferred site allocations.

2.34 Stage 1 reduced the list of sites to be assessed down to just over 100 sites that were above the size thresholds for housing and employment and not in absolute constraint areas. Stage 2 assessed the site options to prioritise the allocation of land within the urban area, with an emphasis on brownfield sites, as well as ensuring they conform with the emerging spatial strategy for the pattern and scale of development in the Borough. Sites were considered based on the sequential approach to direct growth to specific locations, based on the overall hierarchy set out in **Table 2.3**. The hierarchy seeks to ensure that previously developed land in the urban area will be given the highest priority, with isolated greenfield sites in the Green Belt given the lowest priority.

Table 2.3: Overall hierarchy used by Enfield Council in Stage 2 of the Site Selection Methodology

Priority	Broad Site location	Site typology	Approach to Allocation
1	Sites within the urban area	Brownfield sites in urban area	Allocation, subject to other stages
2		Greenfield sites in urban area	Allocation, subject to other stages
3	Accessible Green Belt sites	Brownfield sites in accessible ⁶ Green Belt location	Potential allocation possible, subject to alignment with emerging spatial strategy
4		Greenfield sites in accessible, lower performing Green Belt location	Potential allocation possible, subject to alignment with emerging spatial strategy
5		Greenfield in accessible, moderately performing Green Belt location	Potential allocation less likely, unless exceptional circumstances
6		Greenfield in accessible, high performing Green Belt location	Potential allocation less likely, unless exceptional circumstances
7	Isolated Green Belt Sites	Brownfield in isolated Green Belt location	No allocation unless exceptional circumstances
8		Greenfield in isolated low or moderately performing Green Belt location	No allocation unless exceptional circumstances

2.35 A small number of sites were excluded from further consideration as they were assessed as priority 7 and 8 (i.e. isolated Green Belt locations). The remaining sites were subject to Stage 3: Detailed Planning Assessment by the Council, and Stage 4: IIA by LUC. The IIA findings for these reasonable alternative site options is provided in **Appendix E**. At the same time the spatial strategy options described above were also subject to IIA and the findings of both were provided to the Council in advance of final decisions being made on the sites to allocate. The Council then carried out Stages 5 and 6 of the Site Selection Methodology to determine which sites to allocate in the 2021 Enfield Local Plan: Main Issues and Preferred Approaches document. The Council's reasons for selecting the allocation sites and discounting the other site options are provided in **Appendix F**.

2.36 In **Appendix E**, there is an IIA appraisal matrix for each reasonable alternative site option, which contains two columns that show the likely sustainability effect of the site option (and justification) *without* taking any mitigation into account. For those site options that were then selected for allocation in the 2021 Enfield Local Plan, the IIA appraisal matrix includes another two columns that show the likely effects of the site (and justification) *with* any mitigation provided in the Local Plan policies or site proformas taken into account. For site allocations where the proposed use changed from the initial reasonable alternative site option appraisal, an extra set of two columns are provided to show the appraisal of the site allocation with its revised use and *without* mitigation. Reasonable alternative site options that were not allocated by the Council, are shown in the section of Appendix E entitled 'Site options appraised but not allocated'.

⁶ Accessibility will be determined by the Public Transport Accessibility Level (PTAL) of sites

Policy options

2.37 Drawing on the policy approaches included in the 2018 Issues and Options document, the consultation responses received and the current national and London level planning context, the Council has drafted an updated vision and strategic objectives along with 36 strategic policies (including 10 Place policies) and 57 development management policies across the following topics:

- Good growth in Enfield;
- Places;
- Sustainable Enfield;
- Addressing equality and improving health and wellbeing;
- Blue and green Enfield;
- Design and character;
- Homes for all;
- Economy;
- Town centres and high streets;
- Rural Enfield;
- Culture, leisure and recreation;
- Movement and Connectivity;
- Environmental protection; and
- Delivering and monitoring.

2.38 The IIA team appraised early drafts of these policies during May 2021 and provided recommendations to the Council to help improve the sustainability of the policy requirements. The IIA recommendations and how they were addressed by the Council in the 2021 Enfield Local Plan: Main Issues and Preferred Approaches document are set out in **Table 2.4**.

2.39 Some additional policy options for Policy SP H1: Housing, Policy DM H10: Gypsy and Travellers' accommodation and Policy DM BG10: Burial and cremation space are set out in the 2021 Enfield Local Plan below each of these policies. The housing options (A to D) relate to the level of housing growth to be accommodated and where this might go. They are very similar to the spatial strategy options referred to in **Table 2.1** above and therefore are covered by the IIA findings set out in **Appendix D**. The Gypsy and Travellers' accommodation options set out below Policy DM H10 relate more to the phasing and/or process of addressing Gypsy and Traveller accommodation needs (e.g. address the issue now in the Local Plan, wait for the Mayor of London's London-wide assessment of need although timing of this is uncertain, or address in the proposed Gypsy and Traveller Local Plan which is the preferred option) rather than any choices between locations within the Borough and have therefore not been subject to IIA. Finally, the policy options below Policy DM BG10: Burial and crematorium space have been assessed and the findings are set out in **Chapter 6**.

Table 2.4: IIA recommendations and how these have been addressed within the 2021 Enfield Local Plan: Main Issues and Preferred Approaches

Policy when originally assessed	Policy in Regulation 18 'Main Issues and Preferred Approaches' Local Plan	IIA recommendations	How IIA recommendations have been addressed by the Council within the 2021 Enfield Local Plan
Vision	Vision	The vision could make reference to sustainable transport, minimising air pollution, community safety, mitigating flood risk and improving water quality.	Revised vision now includes references to delivering sustainable buildings and transport options. Makes reference to a Borough that will be carbon neutral, better air quality and water quality. Policy SE1 making specific reference to reducing air pollution and managing flood risk. Theme 4) of the vision makes reference to a place of safe growing.
SP1: Delivering good growth in Enfield	SP SS1: Spatial strategy	Policy SP1: Delivering good growth in Enfield could provide a sentence on mitigating flood risk.	Not covered in SS1 but mitigating flood risk is covered in Policy SE8: Managing flood risk.
Housing policies in general	Housing policies in general	Prioritising the development of brownfield land over greenfield land could be promoted across all housing policies.	Covered in overarching Policy SS1: Spatial strategy. Part 3 of the policy – prioritises the redevelopment of brownfield land, vacant and underused buildings for new housing and employment uses.
SP10: Promoting town centres	SP TC1: Promoting town centres	Policy SP10: Promoting town centres as places and as part of our community could be strengthened in terms of safety, particularly in the evening and at night.	Evening economy is not just focused in the town centres – but also in new placemaking areas, such as Meridian Water. Policy E9 deals with evening and night time economy and deals with safety in part 1b of the policy.
SP20: Delivering social and cultural infrastructure facilities in the right location	SP SC2: Protecting and enhancing social and community infrastructure	Policies SP20: Delivering social and cultural infrastructure facilities in the right location and DM42: Community facilities could have additional wording on minimising the impact of	Not specifically covered in the 2 policies mentioned. However, chapter 4 deals with sustainability and supports the transition to net zero carbon

Policy when originally assessed	Policy in Regulation 18 'Main Issues and Preferred Approaches' Local Plan	IIA recommendations	How IIA recommendations have been addressed by the Council within the 2021 Enfield Local Plan
DM42: Community facilities	Incorporated into SP SC2: Protecting and enhancing social and community infrastructure	development on climate change (e.g. sustainable construction practices and/or renewable energy technologies).	development. Policy SE1 responds to the impact of climate change and SE2 deals sustainable design and construction practices, whilst SE6 supports development involving renewable and low carbon energy.
DM22: Fostering a successful evening and night-time economy	DM E9: Fostering a successful evening and night-time economy	Policy DM22: Fostering a successful evening and night-time economy could also be strengthened in terms of safety through additional wording (lighting, active frontages, etc.).	Covered in Policy TC2 – where proposals must provide active frontages to the public realm.
SP19: Responding to the climate emergency	SP SE1: Responding to the climate emergency	Policy SP19: Responding to the climate emergency could have more specific policy wording that outlines the various measures that would help with climate change adaptation, e.g. orientation of buildings and trees for shading.	SE1, part 6 of the policy ensures development is designed for resilience in a changing climate.... through considering the orientation of buildings and using trees for shading. SE7: Climate change adaptation and managing heat risk. Part 2b of the policy requires developments to: optimise the layout, orientation, materials, technology and design of buildings and spaces to minimise any adverse impacts on internal and external temperature, reflection, overshadowing, micro-climate and wind movement.
DM3: Creating liveable, inclusive and quality public realm	DM DE5: Creating liveable, inclusive and quality public realm	The wording in Policy DM3: Creating liveable, inclusive and quality public realm could be amended to include reference to the historic environment and the protection and enhancement of heritage assets and their settings.	Policy DE10 deals with the conservation and enhancement of the Borough's heritage assets. Development proposals are required to conserve and enhance.
DM1: Character and design of new development	SP DE1: Delivering a well-designed, high quality and resilient environment	Policy DM1: Character and design of new development currently states that development must complement heritage assets. This wording could be strengthened to include specific reference to heritage assets.	Covered in Policy DE9: Conserving and enhancing heritage assets.
SP4: Delivering homes that meet peoples' needs	SP H1: Options for housing growth	Policy SP4: Delivering homes that meet peoples' needs could make reference to energy efficient design.	Covered in Sustainable Enfield chapter.

Policy when originally assessed	Policy in Regulation 18 'Main Issues and Preferred Approaches' Local Plan	IIA recommendations	How IIA recommendations have been addressed by the Council within the 2021 Enfield Local Plan
SP11: Encouraging vibrant and resilient town centres	DP TC2: Encouraging vibrant and resilient town centres	Policy SP11: Encouraging vibrant and resilient town centres could be amended to include reference to the historic environment and the protection and enhancement of heritage assets and their settings.	Covered in Policy DE9: Conserving and enhancing heritage assets.
SP12: Visitor accommodation	CM CL3: Visitor accommodation	Policy SP12: Visitor accommodation could require all visitor accommodation to be sympathetic to the character of the area.	CL3, part 2 of the policy amended to include: proposals involving.... will be supported where they are: <i>sympathetic to the character of the area, but also able to create new places which reflect current times and needs, and which are fit for the future.</i>
DM40: Improving health and wellbeing of Enfield's diverse communities	SP SC1: Improving health and wellbeing of Enfield's diverse communities	Policy DM40: Improving health and wellbeing of Enfield's diverse communities could be made more specific by identifying how people's health and wellbeing will be improved (e.g. the provision of primary healthcare facilities and open space).	Provision includes: <ul style="list-style-type: none"> • access to sustainable modes of travel, including safe cycling routes, attractive walking route and easy access to public transport to reduce car dependency; • access to green infrastructure, including to blue corridors, open spaces and leisure, recreation and play facilities to encourage physical activity; • access to local community facilities, services and shops, which encourage opportunities for social interaction and active living; • access to local healthy food opportunities, allotments and food growing spaces; • an inclusive development layout and public realm that considers the needs of all, including the older population and disabled people; and

Policy when originally assessed	Policy in Regulation 18 'Main Issues and Preferred Approaches' Local Plan	IIA recommendations	How IIA recommendations have been addressed by the Council within the 2021 Enfield Local Plan
			<ul style="list-style-type: none"> active design principles which support wellbeing and greater physical movement as part of everyday routines.
SP22: Securing contributions to manage and mitigate the impact of development in Enfield	SP D1: Securing contributions to manage and mitigate the impact of development in Enfield	Policy SP22: Securing contributions to manage and mitigate the impact of development in Enfield could be more specific when referring to 'Other site-specific mitigation'.	No changes made.

Stage C: Preparing the IIA report

2.40 This IIA report describes the process that has been undertaken to date in carrying out the IIA of the Enfield Local Plan. It contains an appraisal of alternative spatial strategy options as well as the potential sites for housing, employment and mixed-use development considered for inclusion in the Local Plan, as well as the policies in the Local Plan itself. The focus of the appraisal has been the identification of significant effects, whether positive or negative, in accordance with the SEA Regulations.

2.41 This IIA report is intended to meet all the reporting requirements of Schedule 1 of the SEA Regulations.

Stage D: Consultation on the Local Plan and this IIA report

2.42 Enfield Council is inviting comments on the Enfield Local Plan: Main Issues and Preferred Approaches (2021) and this IIA report. These documents are being published on the Council's website for consultation from 21 June to 13 September 2021.

Stage E: Monitoring and implementation of the Local Plan

2.43 Chapter 8 sets out suggested monitoring measures for potential negative effects that could arise as a result of implementing the Enfield Local Plan, although this will be updated at each stage of the plan preparation.

Appraisal methodology

2.44 The SEA Regulations, Schedule 2(8) require the Environmental Report to include:

“...a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”

IIA framework

2.45 The development of a set of IIA objectives (known as the IIA framework) is a recognised way in which the likely environmental and sustainability effects of a plan and reasonable alternatives can be described, analysed and compared. The IIA framework for the Local Plan is presented in **Table 3.2** and was originally developed by AECOM from the analysis of national, regional and local policy objectives, baseline information, and key sustainability issues identified in the Plan area.

2.46 The IIA framework comprises a series of IIA objectives, each accompanied by a set of guide questions that were used to appraise the performance of the Local Plan against the IIA objectives, including overall alternative spatial strategies for growth being considered by the Council for inclusion in the Local Plan. The relationship between the key sustainability issues and the IIA objectives is described in **Table 3.1** of this IIA Report.

2.47 The relationship between the 'SEA Topics', which are the specific topics that SEA is required to cover, as per Schedule 2 of the SEA Regulations, is shown in the final column of **Table 3.2**. It can be seen that a number of the IIA objectives cut across SEA Topics, showing how inter-related many of these are.

2.48 As a result of the review of earlier IIA work undertaken by AECOM, LUC proposed some refinements to the original IIA framework developed by AECOM. LUC has restructured the framework to clearly state the headline objective for each topic, in addition to moving some of the detail contained within AECOM's list of objectives to the appraisal questions column, whilst ensuring that all SEA topics are covered. The framework addresses any relevant concerns expressed by the statutory consultees in the IIA Scoping Report.

Key to IIA effects symbols

2.49 The findings of the IIA are presented as colour coded symbols showing an effect for each option against each one of the IIA objectives along with a concise justification for the effect given, where appropriate. The colour coding is shown in **Figure 2.2** below.

Figure 2.2: Key to IIA effects symbols

++	Significant positive effect
++/-	Mixed significant positive and minor negative effect
+	Minor positive effect
0	Negligible effect
-	Minor negative effect
-/+	Mixed significant negative and minor positive effect
--	Significant negative effect
++/--	Mixed significant positive and significant negative effect
+/-	Mixed minor positive and minor negative effect
?	Uncertain effect
N/A	Not applicable

2.50 Where a potential positive or negative effect is uncertain, a question mark was added to the relevant symbol (e.g. +? or -?) and the symbol has been colour coded as per the potential positive, negligible or negative effect (e.g. green, white, orange/red, etc.). Negligible effects are recorded where a policy or site allocation is considered to have no effect in contributing to achievement of the IIA objective. This is usually the case when an objective or policy is focused on a very narrow topic and would only affect two or three IIA objectives, such as the Development Management policies, for example on protecting water courses, student accommodation or biodiversity net gain, rewilding and offsetting. For site options, negligible effects occur usually because the location of a site would not affect an IIA objective (e.g. IIA2: Climate change adaptation), as this would depend on the design measures required in policies.

2.51 The likely effects of options and policies need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy on the IIA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, effects are relative to the scale of proposals under consideration.

2.52 Mixed effects have only been presented where directly opposing effects (i.e. positive and negative) have been identified through the appraisal (e.g. +/-, ++/-, -/+ and ++/--). For some IIA objectives, it is possible that a policy or site might have a minor positive effect in relation to one aspect of the policy and a significant positive effect in relation to another aspect (giving a score of +/++). However, in these instances, only the significant score is shown in the appraisal tables. Similarly, if a policy or site could have a minor and significant negative effect (-/-) for the same IIA objective, only the significant negative score is shown in the appraisal tables. The justification text relating to the appraisal describes where the various elements of the policy or site being appraised might have potential to result in effects of differing magnitude.

2.53 The likely sustainability effects of the Regulation 18 Enfield Local Plan are summarised in **Chapters 4 to 6**. An assessment of the potential cumulative impacts of the Regulation 18 Enfield Local Plan as a whole is presented in **Chapter 7**.

Site assessment assumptions

2.54 IIA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, for each of the IIA objectives in the IIA framework, a clear set of decision-making criteria and assumptions for determining significance of the effects were developed. These assumptions set out clear parameters within which certain IIA effects would be given, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The assumptions are presented in **Appendix B**. The performance

of the sites against the site assessment assumptions were used, alongside other technical assessments, to inform Enfield Council's selection of individual site allocations.

Assumptions regarding distances

2.55 Reference is made to distances in the site assessment assumptions. The most suitable and easily achievable mode of transport is walking, and the distances refer to walking distances. There are a number of pieces of research that give a variety of recommended guidance distances for walking. For example, the Institute of Highways and Transportation found that the average length of a walk journey is one kilometre. Given the wide range of services and facilities normally considered in IIAs, LUC has developed some guideline distances that it uses in its IIA work, which are reflected in the IIA site assessment assumptions for the Local Plan.

2.56 For the purposes of the appraisal, distances in the appraisal will be measured as the straight line distance from the edge of a site option to existing services and facilities, and therefore actual walking distances are likely to be greater (e.g. depending on the house location within a larger site and the availability of a direct route).

Difficulties encountered

2.57 To date, the main difficulties encountered or limitations of the IIA process include:

- The high-level nature of the policy options meant that at times it was difficult to assess in detail the likely effects of the options on each IIA objective. Once policies have been worked up in more detail, it should be possible to draw more certain conclusions about their likely effects and make recommendations on how policy options might be worded to improve their sustainability performance.
- Because many effects of development are dependent on the exact location, layout and design of development, it may be possible to mitigate some of the effects highlighted in this IIA. However, given the inherent uncertainties about these details at this strategic stage of planning and assessment, the IIA focuses on identifying potential significant effects of the options considered, without making assumptions about detailed design or mitigation measures that might be implemented.
- The spatial strategy options considered at the Issues and Options stage and during 2021 represent strategic principles for the scale and distribution of growth to be delivered over the Plan period. Consequently, the IIA focusses on the likely strategic implications of their implementation. This approach ensured that all options could be appraised consistently.
- The number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies means that it has not been possible within the resources available to consider every potentially relevant document in detail (see **Chapter 3** and **Appendix A**). However, the key generic messages relevant to the preparation of the Enfield Local Plan and the IIA have been drawn out.
- Similarly, with regard to the evidence base upon which effects have been identified, **Chapter 3** summarises the latest baseline information available compared to what was presented in the 2020 IIA Scoping Report in **Appendix A**. The IIA of future iterations of the Local Plan and associated new reasonable alternatives will continue to benefit from the more recent, accurate and consistent evidence available.
- There was a need to appraise a large number of site options consistently. In order to address this issue, detailed assumptions relating to each of the IIA objectives were developed and applied during the appraisal of site options (as described above and set out in **Appendix B**).
- The IIA assumptions for the site options considered proximity to railway stations and tube stations and bus stops. However, it is acknowledged that the final assessment of sites produced by the Council give consideration to PTAL ratings.
- A number of limitations relating to the GIS data that was used to apply the assumptions are recognised:
 - When considering the proximity of site options to healthcare facilities, only NHS GP surgeries were considered. This is because these are the facilities most likely to be used by local residents.
 - When considering the proximity of site options to existing schools, only state schools were considered. This is because these schools are open to all and it is expected the majority of school age residents will attend state schools. In addition, local catchments may not apply to independent schools, for which pupils will often travel further.

- The available data for agricultural land classification did not distinguish between Grade 3a (considered to be high quality) and 3b (not considered to be high quality). This again resulted in some uncertainty in the effects, as set out in the assumptions (see **Appendix B**).
- GIS data used to inform the assessment was generally only available for the extent of LBE, which could affect the IIA findings for sites on the edge of the Borough.

Chapter 3

Sustainability context

3.1 Schedule 2 of the SEA Regulations requires:

- (a) *“an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes” and*
- (e) *“the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”*

3.2 An outline of the Plan is provided in **Chapter 1** of this IIA Report. The other reporting requirements are met in this chapter.

Relationship with other relevant plans or programmes

3.3 The Enfield Local Plan is not prepared in isolation and must be in conformity with a range of international and national plans and programmes as show in **Figure 3.1** below. In addition, the Local Plan comprises any ‘made’ Neighbourhood Plans within the Borough and is supported by other documents such as the Statement of Community Involvement, Local Development Scheme, Authority Monitoring Report and Supplementary Planning Documents.

Policy context

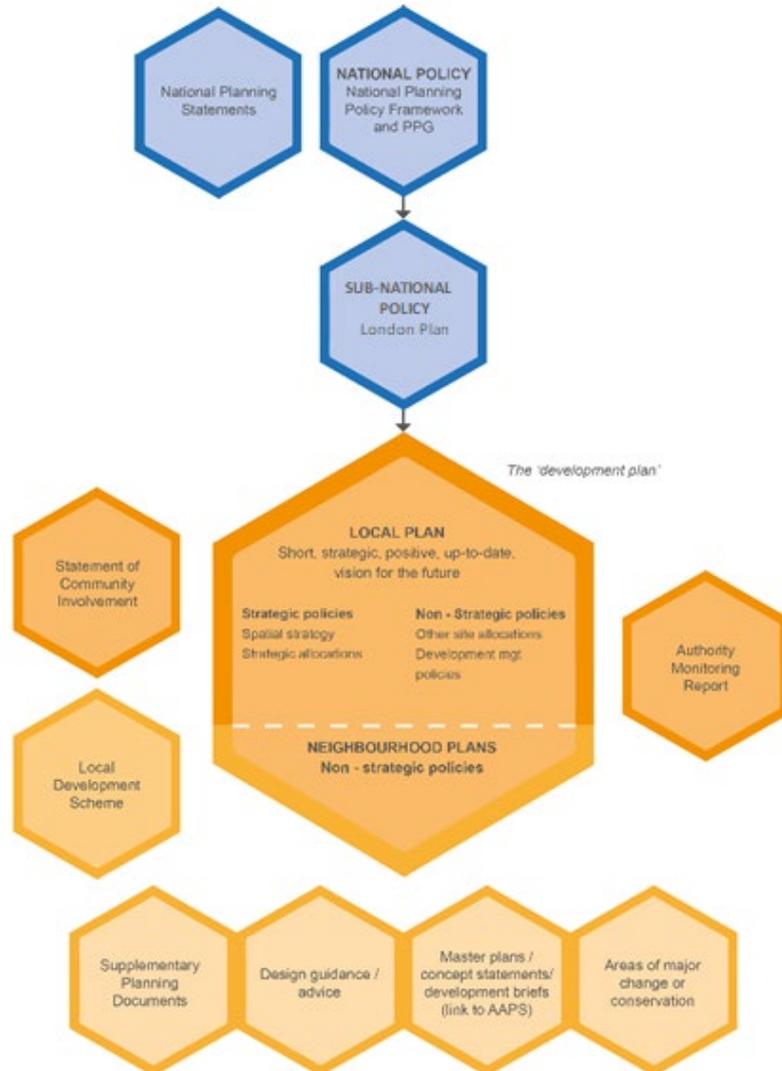
3.4 This section sets out the policy context within which the Local Plan must operate in relation to the various sustainability themes covered by the SA. This context informs consideration of what constitute reasonable alternative policy options for the Plan as well as the framework of sustainability objectives against which the Plan has been appraised. A more detailed review of the relevant documents is set out in the IIA Scoping Report, provided in **Appendix A**.

3.5 It should be noted that the policy context is inherently uncertain as the current framework outlined here is likely to change in response to a number of key factors:

- **Brexit** – Following the UK’s departure from the European Union (EU) on 31 January 2020, it entered a transition period which ended on 31 December 2020. From 1 January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. Relevant EU legislation has still been referred to in this report but will be removed as and when UK legislation is amended.
- **COVID-19** – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown and will depend on a variety of factors, particularly the vaccine programme. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development, changes to permitted development rights, increased remote working and reduced commuting and related congestion and air pollution, increased prioritisation of walking and cycling over public transport, and increasing pressure to ensure satisfactory living standards are set and enforced.
- **Planning for the Future White Paper** – The August 2020 consultation set out proposals for the reform of the planning system in England, covering plan-making, development management, development contributions, and other related policy proposals. Potential implications include reducing the period of a Local Plan period to 10 years, a move towards a zonal planning system with areas of England allocated as either Growth Areas, Renewal Areas or Protected Areas, and the abolition of the Community Infrastructure Levy (CIL) and Section 106.

3.6 It is also possible that UK and sub-national climate change policy may change as public awareness and prioritisation of the threat of climate change grows, as illustrated by the increasing number of local authorities, including Enfield Council, that have declared a climate emergency.

Figure 3.1: Local Plan relationship with other relevant plans or programmes



International policy context

3.7 At the international level, there is a wide range of plans and programmes which act to inform and shape national level legislation. Planning policy in England at a national and local level (i.e. the NPPF and Local Plans) should be aware of and in conformity with the relevant legislation.

National policy context

3.8 There is an extensive range of national policies, plans and programmes that are of relevance to the Local Plan preparation and SA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national policies, plans and programmes, focusing on those that are of most relevance. A summary of the main objectives of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) of relevance to the Local Plan and IIA is provided below. In addition, the main sustainability objectives of other international national plans and programmes which are of most relevance for the Local Plan and IIA have been reviewed and a summary of the implications for the Local Plan and IIA is provided below the section on the NPPF and PPG.

The National Planning Policy Framework and Planning Practice Guidance

3.9 The NPPF⁷ is the overarching planning framework which provides national planning policy and principles for the planning system in England. The Local Plan Review must be consistent with the requirements of the NPPF, which states:

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

3.10 The national PPG⁸ sets out the Government’s planning policies for England and how these are expected to be applied. Sitting alongside the NPPF, it provides an on-line resource that is updated on a regular basis for the benefit of planning practitioners.

3.11 The overarching nature of the NPPF means that its implications for the SA relate to multiple topics which this report seeks to address. Considering the importance of the NPPF to the English planning system, the relevance of the Framework and its implications for the plan making process and the SA is provided in more detail below. It should be noted that between January and March 2021 the Government is consulting on draft revisions to the NPPF⁹ in response to the Building Better Building Beautiful Commission “Living with Beauty” report. The consultation is also seeking views on the draft National Model Design Code¹⁰, which provides detailed guidance on the production of design codes, guides and policies to promote successful design. Further details on the consultation are available on the [Government website](#).

3.12 Climate change adaption and mitigation, energy efficiency and waste minimisation measures for new development including through the promotion of renewable energy schemes are also supported through the NPPF. One of the core planning principles is to “support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.” Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

3.13 Although Local Plans can no longer require levels of the Code for Sustainable Homes, they can promote the Home Quality Mark to support residents in understanding the quality and performance of new build homes and can also set targets for developers to provide for a given percentage of energy used by a new development to come from on-site renewable or low carbon technologies. Local Plan policies can further support the development of renewable energy technologies where appropriate, in line with climate change mitigation strategies and targets.

3.14 The Local Plan can also identify areas where development would have lesser impacts in terms of its contribution to climate change (by limiting the need for site residents and users to travel, for example) or vulnerability to climate change. The SA can consider the contribution the alternatives make in terms of contribution to climate change mitigation as well as climate change adaptation.

3.15 In relation to **health and wellbeing**, healthy, inclusive and safe places which promote social integration, are safe and accessible, and enable and support healthy lifestyles are supported through the Framework.

3.16 One of the core planning principles is to “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”. It is identified in the document that “a network of high quality open spaces and opportunities for sport and recreation is important for the health and well-being of communities”. Furthermore, the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship is supported. Importantly, Local plans should also “contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”.

⁷ Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework

⁸ Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance

⁹ Ministry of Housing, Communities and Local Government (2020) National Planning Policy Framework (Draft text for consultation)

¹⁰ Building Better, Building Beautiful Commission (2020) Building Better Building Beautiful Commission “Living with Beauty”

3.17 The delivery of new housing is considered to support local communities by meeting housing needs and addressing shortages. The Local Plan can have a significant influence on addressing inequalities including those relating to health and will need to consider the appropriate siting of new development, particularly large development sites that are likely to include new service and facility provisions. The Local Plan can ensure that new development is located in areas which can improve accessibility for existing as well as new residents and ensure that future development does not exacerbate existing inequalities. The SA process can support the identification and refinement of options that can contribute to reducing inequalities and support the development of policy options that cumulatively improve the wellbeing of local communities.

3.18 The NPPF sets out the approach Local Plan should take in relation to **biodiversity** states that Plans should “identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation”. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and support measurable for multi-functional areas and net gains for biodiversity. A strategic approach to maintaining and enhancing networks of habitats and green infrastructure is to be supported through planning policies.

3.19 The Local Plan should seek to maximise any opportunities arising for local economies, communities and health as well as biodiversity. This should be inclusive of options which are supportive of enhancing the connectivity of green infrastructure and promoting the achievement of biodiversity net gain. The SA process should support the identification and maximisation of potential benefits through the consideration of alternatives and assessment of both negative and positive significant effects.

3.20 In relation to **landscape**, the NPPF includes sets the planning principles of recognising the intrinsic beauty and character of the countryside as well as protecting and enhancing valued landscapes. Reference is included with regards this purpose at National Parks, The Broads and Areas of Outstanding Natural Beauty.

3.21 The Local Plan should be supportive of an option to development which would protect the landscape character of the Borough. Where appropriate it should seek to protect the individual identities of the areas within the Borough.

3.22 The NPPF states that in relation to the **historic environment** plans should “set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats”. Where appropriate, plans should seek to sustain and enhance the significance of heritage assets and local character and distinctiveness, while viable uses of assets should be considered. Plans should take into account the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. They should also consider the contribution the historic environment can make to the character of a place.

3.23 The NPPF states that new and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, pollutions including **water pollution and air quality**. Inappropriate development in areas at risk of **flooding** should be avoided. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account implications for water supply. Furthermore, strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision infrastructure for water supply and wastewater.

3.24 The Local Plan presents an opportunity to consider incorporating targets for water efficiency and the level of water consumption and grey water recycling in any new development. The Local Plan also can ensure that development is sited away from areas of high flood probability and that appropriate water drainage is in place in line with flood risk strategies. The SA process should seek to identify and address potential negative effects on the water environment, including implications relating to wastewater.

3.25 The NPPF states that planning system should protect and enhance **soils** in a manner commensurate with their statutory status or quality, while also encouraging the reuse of **previously developed land**.

3.26 The Local Plan can seek to ensure the appropriate protection of soil quality, including best and most versatile agricultural land. Further to this the Local Plan should ensure that new development does not conflict with current mineral operations as well as long-term mineral resource plans. The SA process should inform the development of the Local Plan by helping to identify alternatives which would avoid the areas of highest soil quality and best and most versatile agricultural land, as well as those which would promote the use of brownfield land.

3.27 The Local Plan can offer enhanced protection for designated and non-designated heritage assets and their settings, including any potential archaeological finds in line with heritage protection and enhancement plans. The SA has a role to play by identifying which alternatives could offer opportunities to secure the protection and enhancement of assets as well as those which might have significant impacts in terms of their appropriate use and setting.

3.28 The Framework sets out that in terms of **economic growth** the role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure. Furthermore, planning policies should address the specific locational requirements of different sectors.

3.29 Local planning authorities should incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”. Local Plans are required to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.”

3.30 The Local Plan should seek to maximise the potential benefits of nearby strategic growth, whilst at the same time ensuring the vitality and viability of smaller localised economies. Ensuring that local town centres and settlement services and facilities are maintained and enhanced is also important and will also provide support for local communities. The SA process can support the development of the Local Plan to ensure that its policies are considerate of impacts on the economy in Enfield. The process can also be used to demonstrate that impacts on the viability of town centres in the area and surrounding areas have been considered.

3.31 The NPPF encourages local planning authorities to consider **transport** issues from the earliest stages of plan making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The framework also states that the planning system should actively manage growth patterns in support of these objectives.

3.32 Growth will inevitably increase traffic on the roads which also has implications for air quality, and the Local Plan and SA process can seek to minimise effects of this nature through appropriately siting new development, identifying where mitigation may be needed and requiring the necessary transport provisions and contributions from new development. The Local Plan as supported by the SA should seek to identify opportunities to maximise the potential for alternative modes of transport to the car and reduce the need to travel, therefore reducing emissions, through the consideration of alternatives and assessment of significant effects. This includes potential opportunities that may arise as a result of the delivery of new infrastructure.

Other international and national policies, plans and programmes

3.33 Numerous other policies, plans and programmes at a national level are of relevance to preparation of the Local Plan and the IIA. Unlike the NPPF, most of the documents are focussed on a specific topic area which the IIA will consider. There will be some overlap between IIA topics covered by these plans and programmes where those documents contain more overarching objectives. However, the plans and programmes considered of most relevance for the IIA have been grouped by the topics they most directly seek to address, and green boxes below each topic heading summarise the implications of the national plans, policies and programmes (including the NPPF) for the Local Plan and IIA.

Climate change adaptation and mitigation, energy efficiency and waste minimisation

3.34 The relevant international and national plans, policies and programmes (PPPs) under this topic are:

- United Nations Paris Climate Change Agreement (2015).
- Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018).
- Department for Transport, Decarbonising Transport: Setting the Challenge (2020).
- Defra and the Environment Agency, Understanding the risks, empowering communities, building resilience: The National Flood and Coastal Erosion Risk Management Strategy for England (2011).
- Ministry of Housing, Communities and Local Government, National Planning Policy for Waste (NPPW) (2014).

- Defra, Waste Management Plan for England (2013).
- HM Government, The Clean Growth Strategy (2017).

Implications for the Local Plan and IIA: The Local Plan should consider setting out policies to achieve climate change and adaptation while also encouraging development which would help to minimise carbon emissions. This can be done through siting development allocations in areas where sustainable transport patterns can be best achieved and encouraging development to make use of more sustainable construction methods and sources of energy. The Local Plan should also contain policies to encourage appropriate use of SuDS.

The IIA can test policy options in relation to the contributions they make towards these aims. It should also appraise the contribution individual site options can make to limiting carbon emissions (including through the uptake of more sustainable sources of energy). Sites should also be considered in terms of the impact they will have in terms of promoting climate change adaptation as well as reducing flood risk and the amount of waste that goes to landfill.

Health and well-being

3.35 The relevant international and national PPPs under this topic are:

- The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002).
- United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998).
- Public Health England, PHE Strategy 2020-25.
- HM Government, Laying the foundations: housing strategy for England (2011).
- Ministry of Housing, Communities and Local Government, Planning Policy for Traveller Sites (2015).

Implications for the Local Plan and IIA: The Local Plan, in conjunction with the Infrastructure Delivery Plan, needs to consider the need for infrastructure as this has a significant impact on the environment and it should be prepared to ensure that the population has access to sustainable low carbon infrastructure and services and facilities and that there is sufficient capacity within them to serve the increased population. This should include healthcare, education and open space. Development allocations should be located in areas where facilities are most accessible, issues of overcapacity would be less likely to result, and active modes of travel might be promoted. Policies in the Local Plan can also help to facilitate the supply of healthy local food. The provision of an appropriate level of housing over the plan period will help address issues of disparity in terms of access to decent housing in the plan area. The provision of new housing should be considerate of local needs with regards to housing size, tenure and type, including the needs of Travellers.

Policy options considered for the Local Plan can be tested through the IIA in relation to the contributions they make towards these aims. The IIA should also appraise the contribution individual site options can make to health and wellbeing. This should be considered through the site's ability to support the delivery of new infrastructure and facilities which might benefit public health, as well as accessibility to existing infrastructure and facilities of this nature. It may be necessary to consider the capacity of existing facilities when considering individual site options. Consideration should also be given to the capacity of sites to deliver new homes, including affordable homes.

Environment (biodiversity/geodiversity, landscape and soils)

3.36 The relevant international and national PPPs under this topic are:

- International Convention on Wetlands (Ramsar Convention) (1976).
- European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979).
- International Convention on Biological Diversity (1992).
- United Nations Declaration on Forests (New York Declaration) (2014).
- European Landscape Convention (2002).

- The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).
- Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018).
- Defra, Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011).
- Defra, Biodiversity offsetting in England Green Paper (2013).
- Defra, Safeguarding our Soils – A Strategy for England (2009).

Implications for the Local Plan and IIA: The Local Plan should be prepared to limit the potential for adverse impacts on biodiversity and geodiversity as well as important landscapes (including those that are designated) and higher value soils. The plan should also take into account non-designated landscapes identified to be particularly sensitive to development and non-designated habitats which form part of wider ecological network. The plan also presents opportunities to promote the achievement net gain in biodiversity. It can also be used to encourage the re-use of brownfield land and protect more valuable agricultural soils from development. Benefits may be achieved by directing development to less sensitive locations. The allocation of new sites for development and updated planning policy can also be used to achieve habitat connectivity through the provision of new green infrastructure.

It will be role of the IIA to test the policy options in terms of the effect they will have on biodiversity sites and habitats as well as value landscapes. The effects of these options in relation to promoting the development of brownfield land and limiting the loss of valuable agricultural soils should also be appraised. Site options should be considered in these terms also, making use of the findings of the HRA and landscape character assessment work where appropriate.

Historic environment

3.37 The relevant international and national PPPs under this topic are:

- The United Nations (UNESCO) World Heritage Convention (1972)
- European Convention for the Protection of the Architectural Heritage of Europe (1985)
- Valletta Treaty, formerly the European Convention on the Protection of Archaeological Heritage (1992)
- The Heritage Alliance, Heritage 2020.
- Historic England, Corporate Plan 2018-2021.
- Historic England, Sustainability Appraisal and Strategy Environmental Assessment: Historic England Advice Note 8 (2016).

Implications for the Local Plan and IIA: The potential impact of new development on the historic environment, including local character as well as designated and non-designated heritage assets and their respective settings should also inform the preparation of the Local Plan. Particular regard may be given to protecting heritage assets which have been identified as being 'at risk' (both at the national and local level). Policies should be included to address these issues and site options should be considered with regard to the potential for related issues. The IIA should appraise both policy and site options in terms of the potential for effects on the historic environment. It should identify those locations at which development would have the greatest potential to adversely impact the historic environment, as informed by heritage impact assessment work for the Local Plan.

Water and air

3.38 There are no specific international policy agreements under this topic relevant to the preparation of the Enfield Local Plan and the IIA.

3.39 The relevant national PPPs under this topic are:

- Environment Agency, Managing Water Abstraction (2016).
- Defra, Water White Paper (2012).

- Defra, Clean Air Strategy (2012).

Implications for the Local Plan and IIA: The Local Plan should consider setting out policies to promote the efficient use of water and limit all types of pollution including water and air pollution. It should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The allocation of sites for development should take account of areas which have highest sensitivity in relation to these issues, including Source Protection Zones (SPZ) and Air Quality Management Areas (AQMA). To limit the potential for air quality issues to be intensified as development is delivered over the period the Local Plan should also factor in the contribution specific site options can make to achieving modal shift and limiting the need for residents to travel.

The contribution policy options can make to achieving these aims can be tested through the IIA. Individual site options can be considered in relation to particular sensitivities of the WwT infrastructure and other identified areas (such as SPZs and AQMAs).

Economic growth

3.40 There are no specific international economic policy agreements relevant to the preparation of the Enfield Local Plan and the IIA, although there are a large number of trading agreements, regulations and standards that set down the basis of trade with other countries.

3.41 The relevant national PPPs under this topic are:

- HM Government, Industrial Strategy: building a Britain fit for the future (2017).
- Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016-2021.
- LEP Network, LEP Network response to the Industrial Strategy Green Paper Consultation (2017).

Implications for the Local Plan and IIA: The Local Plan should allocate land to support the projected level of economic growth required over the plan period. Local Plan policies should be included to help promote sustainable economic and employment growth to benefit all members of the community as to reduce disparity in the Plan area. This should include support for the infrastructure required for the economy to function successfully. Local economic growth should be considered in the light of wider economic growth of the local LEPs. Employment sites should be located to enable local people to be able to access the new employment opportunities. Local Plan policies may also seek to promote the viability of Enfield Town Centre.

The IIA can test individual site and policy options in relation to the contribution they can make to achieving these aims. Employment site options should be appraised in terms of the contribution they can make to meeting the employment land requirements of the Borough as well as the access residents would have to the employment opportunities delivered.

Transport

3.42 The relevant international and national PPPs under this topic are:

- The Road to Zero.
- Door to Door: A strategy for improving sustainable transport integration.
- Department for Transport, Decarbonising Transport: Setting the Challenge (2020).

The IIA should be used to test policy and site options in terms of the contribution they can make to making transport choices more sustainable in the Borough. As well as testing site options in terms of limiting the need to travel in Enfield, policy options should be tested with regard the contribution they make to the uptake of more sustainable transport options, such as walking and cycling and public transport.

Sub-national policy context

3.43 Below the national level there are further plans and programmes which are of relevance for the Local Plan and IIA process. These plans and programmes sit mostly at the sub-regional, county and district level. Details of those plans and programmes which are relevant at this level are provided in the Scoping Report in **Appendix A**, but given its importance to Enfield's Local Plan, a summary of the implications of the London Plan is provided below.

The London Plan

3.44 The London Plan 2021 is the statutory Spatial Development Strategy for Greater London. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The London Plan is prepared by the Mayor of London in accordance with the Greater London Authority Act 1999 (as amended) and associated regulations. The London Plan is legally part of each of London's local planning authorities' Development Plan. As a result, planning applications, Development Plan Documents and Neighbourhood Plans must be in 'general conformity' with the London Plan.

3.45 The London Plan identifies space for over 52,000 new homes per year in London and has a target that 50% of all new homes should be 'genuinely affordable'. In the London Plan, Enfield Borough has a 10 year housing target of 12,460 new homes and 3,530 new homes on smaller sites. The Borough must also achieve 195 units per year for older persons. According to the London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (March 2008), Enfield Borough requires one additional pitch.

3.46 With regard to employment and industry, the London Plan highlights four Strategic Industrial Locations (SILs) in the Borough: (1) Brimsdown; (2) Central Leaside Business Area; (3) Freezywater/Innova Park; and (4) Great Cambridge Road (all in the Lee Valley Industrial Property Market Area). SILs are London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy. According to Policy E5: Strategic Industrial Locations in the London Plan, SILs should be protected and intensified.

3.47 Policy SI7: Reducing waste and supporting the circular economy in the London Plan seeks to promote a more circular economy that improves resource efficiency, as well as encouraging waste minimisation and waste prevention. By 2026, there should be zero biodegradable or recyclable waste to landfill and all London authorities must meet or exceed the municipal waste recycling target of 65% by 2030. With regard to construction and demolition waste, 95% must be reused, recycled or recovered. Enfield's household, commercial and industrial waste forecast for 2021 is 305,000 tonnes and is projected to increase to 327,000 tonnes by 2041.

3.48 Policy SI2: Minimising greenhouse gas emissions states that there must be a minimum on site reduction of emissions by at least 35% beyond Building Regulations. Residential development should achieve 10%, and non-residential should achieve 15% through efficiency measures.

3.49 Policy G5: Urban greening outlines that boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial developments (excluding B2 and B8 uses). Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering more than 50% green cover across London, will be important to help London become a National Park City.

3.50 Policy G6: Biodiversity and access to nature states that Sites of Importance for Nature Conservation (SINCs) should be protected. When developing Development Plans, boroughs should use up-to-date information about the natural environment and the relevant procedures to identify SINCs, ecological corridors and coherent ecological networks.

Baseline information

3.51 Baseline information provides the context for assessing the sustainability of proposals in the Local Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. To inform an IIA, baseline data must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records that are sufficient to identify trends.

3.52 Schedule 2 of the SEA Regulations requires that the Environmental Report includes descriptions of:

“(2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.”

“(3) The environmental characteristics of areas likely to be significantly affected.”

3.53 Schedule 2(6) of the SEA Regulations requires the likely significant effects of the plan on the environment to be assessed in relation to: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage including architectural and archaeological heritage; landscape; and the inter-relationship between these. As an integrated SA/SEA with HIA and EqIA is being carried out, baseline information relating to other ‘sustainability’ topics has also been included, for example, information about housing, social inclusiveness, transport, energy, waste and economic growth.

3.54 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan’s effects can be assessed in the IIA and monitored during the plan’s implementation. Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the Local Plan to understand the likely future sustainability conditions in the absence of the local plan.

3.55 The May 2020 Scoping Report includes baseline information collected prior to May 2020 and is set out in **Appendix A**. This information is presented for a number of topic areas and where any updates in baseline information sources and trends have been published since May 2020, these have been summarised below under the same topic headings as used in the Scoping Report.

Air Quality

3.56 There is currently a total of 19 Public Highway and Public Car Park electric vehicle charging points installed within Enfield, as of February 2021. In the Council’s Climate Action Plan, there is a commitment to provide an additional 250 charging sockets for electric vehicles on public highways and public car parks by 2025¹¹.

3.57 No other updates to the baseline information presented in Appendix A are required in relation to Air Quality.

Biodiversity

3.58 There are no updates to the baseline information presented in Appendix A required in relation to Biodiversity.

Climate change adaptation

3.59 There are no updates to the baseline information presented in Appendix A required in relation to Climate change adaptation.

Climate change mitigation

3.60 Between 1990 and 2019 there was a 44% reduction in UK greenhouse gas emissions¹².

3.61 In 2018, Enfield’s CO₂ emissions estimates within the scope of influence of Local Authorities totalled 951.1t, with 2.8t CO₂ per capita emissions. This is in comparison to 3.2t CO₂ per capita for London, and 4.2t CO₂ per capita for England¹³.

3.62 Enfield’s Climate Action Plan 2020 states that 32,237 tCO₂e is due to energy used by residents in council homes, and 332,512 tCO₂e produced by the domestic sector across the whole of Enfield¹⁴.

3.63 No other updates to the baseline information presented in Appendix A are required in relation to Climate change mitigation.

¹¹ Enfield Council (2021) Electric vehicle charging. Available from: <https://new.enfield.gov.uk/services/roads-and-transport/electric-vehicle-charging/>

¹² GOV (2021) Final UK greenhouse gas emissions national statistics: 1990 to 2019. [Online] Available from: <https://www.gov.uk/government/statistics/final-uk-greenhouse-gas-emissions-national-statistics-1990-to-2019>

¹³ GOV (2020) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2018. [Online] Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018>

¹⁴ Enfield Council (2020) Enfield Climate Action Plan 2020. [Online] Available at: <https://new.enfield.gov.uk/services/environment/enfield-climate-action-plan-2020-environment.pdf>

Communities

3.64 Mid-year population data for 2019 estimate Enfield's population as 333,794. This represents a decrease since 2018. In comparison, the population of London and England in 2019 increased, and were estimated as 8,961,989 and 56,286,961, respectively¹⁵. The population of Enfield has grown by 13% since 2010¹⁶. Compared to the rest of London averages, Enfield has a higher number of young people aged 0-19 and there are proportionally more people under the age of 20 in Enfield than in England overall. In addition, people aged 65 and over living in Enfield make up 14% of the resident population in 2019¹⁷.

3.65 Based on 2019 Enfield Ethnicity estimates, residents from White British backgrounds make up 35.32% of Enfield's inhabitants with White Irish at 2.18% and other White groups at 25.13%. Other Ethnic Groups represent 5.25% of the population, Mixed Groups at 5.48%, Asian Groups at 10.97% and Black groups at 17.89%. The BAME population in Enfield is projected to increase significantly by a combined average of 15.49% over the next 10 years by 2029, this is relatively higher than the London average increase of 14.27%. This will make Enfield the 10th most diverse borough in 2029 measured by population size of BAME residents¹⁸.

3.66 Pupils in Enfield schools speak over 178 languages and dialects. The top five non-English languages spoken by Enfield school pupils in 2020 were Turkish, Somali, Polish, Albanian and Bengali. In Enfield, data on deaths between 15th March and 5th May 2020 shows that Covid-19 deaths disproportionately affected the following ethnic groups: Turkish, Somalian, African, Caribbean, East Asian and Bangladeshi, and among people who spoke Turkish, Arabic, Akan and Bengali¹⁹.

3.67 Enfield is ranked as the 59th most deprived borough in England and the 12th most deprived in London according to the 2019 English indices of deprivation²⁰. The 10% most deprived areas in Enfield are the most diverse areas with the largest population of ethnic minorities²¹.

3.68 In 2019, 69.7% of pupils in Enfield had achieved at least the expected level across all Early Learning Goals, a rising trend since 2016²².

3.69 No other updates to the baseline information presented in Appendix A are required in relation to Communities.

Crime and community safety

3.70 According to official crime summary data published by the Metropolitan Police, the number of notifiable offences committed in Enfield between January 2019 and December 2019 was 30,5125 – an increase of 9% on the previous 12-month period. The official Met Police crime rate for this period was 89.8 offences per 1000 residents per year. The London-wide crime rate for the same 12-month period was 102.2 per 1000 people. Therefore, the overall crime rate in LBE is lower than the London average²³.

3.71 In Enfield, the three most common types of recorded crime were Violence Against the Person (not including sexual offences), Vehicle Offences and Theft. The largest percentage increase in crime by type of offence was in Robbery, which grew by 39% between 2018 and 2019²⁴.

¹⁵ ONS (2020) Estimate of the population for the UK, England and Wales, Scotland and Northern Ireland. [Online] Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

¹⁶ Enfield Council (2020) Equality and Diversity Annual Report 2020. [Online] Available at: <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>

¹⁷ Enfield Council (2020) Equality and Diversity Annual Report 2020. [Online] Available at: <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>

¹⁸ Enfield Council (2020) Enfield Borough Profile. [Online] Available at: <https://new.enfield.gov.uk/services/your-council/Borough-and-wards-profiles/Borough-profile-2020-your-council.pdf>

¹⁹ Enfield Council (2020) Equality and Diversity Annual Report 2020. [Online] Available at: <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>

²⁰ GOV (2019) English indices of deprivation: Local authority district summaries. [Online] Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

²¹ Enfield Council (2020) Equality and Diversity Annual Report 2020. [Online] Available at: <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>

²² Enfield Council (2020) Equality and Diversity Annual Report 2020. [Online] Available at: <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>

²³ Enfield Council (2020) Enfield Borough Profile 2020. [Online] Available at: <https://new.enfield.gov.uk/services/your-council/Borough-and-wards-profiles/Borough-profile-2020-your-council.pdf>

²⁴ Enfield Council (2020) Enfield Borough Profile 2020. [Online] Available at: <https://new.enfield.gov.uk/services/your-council/Borough-and-wards-profiles/Borough-profile-2020-your-council.pdf>

3.72 Police data shows that there were 9,369 calls concerning Antisocial Behaviour (ASB) logged in the calendar year 2019. This represents a rise of 5.6% on the previous year²⁵. ASB calls have increased in Enfield by 5.6% in the year ending February 2020, compared to the same period in the previous year. Enfield is the second highest borough in London for Serious Youth Violence victims. There were 505 Serious Youth Violence victims in Enfield in the year ending February 2020, an increase of 34%, compared to the same time in 2019, when 377 victims were recorded. Enfield remains significantly above London, which recorded an increase of 8.1% in the same period²⁶.

3.73 Enfield has the 4th largest youth population aged 1-19 in London accounting for just over a quarter of the total population. When considering the rate of serious youth violence per 1000 population aged 1-19, Enfield recorded a rate of 6 victims over the last year, the same rate as boroughs with smaller populations such as Haringey, Islington, Hammersmith & Fulham and Kensington & Chelsea²⁷.

3.74 In the year ending February 2020, Knife Crime in Enfield has increased by 27.5%, compared to the previous year. Offences have increased to 789 by end of February 2020 from 619 the previous year. London experienced a much smaller increase of 5.7% in the same period. Enfield is ranked 8th in London for knife crime victims under 24 years old²⁸.

3.75 The number of people killed or seriously injured on London's roads was 39 per cent lower than the 2005-09 baseline and the number of children killed or seriously injured was 65 per cent lower than the baseline. The number of cyclists killed in 2019 is down by 70 per cent on the 2005-09 baseline, from 17 to five. Whereas nationally there has been just a six per cent decrease since 2008.

3.76 2019 saw a reduction in people killed and seriously injured for all transport modes compared to 2018, see Table 1 below. The numbers of motorcyclists killed and seriously injured declined by six per cent and have continued to decline year on year, despite motorcyclist fatalities increasing in 2019. People walking, cycling and motorcycling made up 81 per cent of all people killed or seriously injured. The number of children seriously injured in collisions also fell with the greatest percentage reduction amongst children as bus and coach passengers. However, the number of children seriously injured as pedal cyclists increased²⁹.

3.77 No other updates to the baseline information presented in Appendix A are required in relation to Crime and community safety.

Economy and employment

3.78 For the period January 2020 to December 2020, 74% of Enfield's population were recorded as economically active in comparison to 80.1% of London's population and 79.1% of the national population. In the same period, 46% of Enfield's population held qualifications of NVQ4 and above, while 7.5% of the population held no qualifications³⁰.

3.79 No other updates to the baseline information presented in Appendix A are required in relation to Economy and employment.

Health

3.80 For the period 2019/20, 58.2% of adults are classified as overweight or obese³¹.

3.81 Obesity in childhood is a global and national cause for concern. Data from Public Health England's annual National Child Measurement Programme for the school year 2018/19 estimate that 963 (23.9% of the total) Reception age children and 1,885

²⁵ Enfield Council (2020) Enfield Borough Profile 2020. [Online] Available at: <https://new.enfield.gov.uk/services/your-council/Borough-and-wards-profiles/Borough-profile-2020-your-council.pdf>

²⁶ Enfield Community Safety Unit (2020) Crime and Scrutiny Panel Report 17th March 2020. [Online] Available at: <https://governance.enfield.gov.uk/documents/s80680/Crime%20Scrutiny%20Performance%20Report%20-%20March%202020.pdf>

²⁷ Enfield Community Safety Unit (2020) Crime and Scrutiny Panel Report 17th March 2020. [Online] Available at: <https://governance.enfield.gov.uk/documents/s80680/Crime%20Scrutiny%20Performance%20Report%20-%20March%202020.pdf>

²⁸ Enfield Community Safety Unit (2020) Crime and Scrutiny Panel Report 17th March 2020. [Online] Available at: <https://governance.enfield.gov.uk/documents/s80680/Crime%20Scrutiny%20Performance%20Report%20-%20March%202020.pdf>

²⁹ TfL (2020) Casualties in Greater London during 2019. [Online] Available at: <http://content.tfl.gov.uk/casualties-in-greater-london-2019.pdf>

³⁰ Nomis (2020) Labour Market Profile – Enfield. [Online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157267/report.aspx?town=enfield#tabempunemp>

³¹ Public Health England (2020) Local Authority Health Profile: Enfield. [Online] Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/6/par/E12000007/ati/102/are/E09000010/iid/93347/age/187/sex/4>

(42.6%) Year 6 children in Enfield are either overweight or obese. These percentages are higher than both the London and England averages. Enfield has the ninth highest prevalence of overweight or obese Reception children within the London boroughs, and the third highest for Year 6 children³².

3.82 In 2018/19, 21,558 adults (aged 17 and over) were recorded as having diabetes in Enfield. This constitutes a prevalence of 8.1%, which is the eighth highest in London. Furthermore, it is higher than both the London average of 6.6% and the England average of 6.9%³³.

3.83 For the period 2019/20, 61% of adults were recorded as being physically active. In 2019, 15.8% of adults (aged over 18) smoked. A national survey carried out in 2014/15 provided local level data that showed 3.5% of 15-year olds in Enfield were smokers – lower than London and national averages but an indication that uptake of smoking remains a threat to young people³⁴.

3.84 Life expectancy for males between 2017 to 2019 was 81.0, while life expectancy for females in the same period was 84.7, which is better than both the regional and national life expectancy³⁵.

3.85 In 2017, 19,261 people aged 16 and over are estimated to have a common mental disorder, defined as any type of depression or anxiety. This is 19.2% of Enfield's resident population. In 2015, 5,298 (9.9%) of children and young people aged 5-16 are estimated to have a mental health disorder, which includes emotional, conduct and hyperkinetic disorders. This is 9.9% of the population³⁶.

3.86 No other updates to the baseline information presented in Appendix A are required in relation to Health.

Heritage and townscape

3.87 No updates to the baseline information presented in Appendix A are required in relation to Heritage and townscape.

Housing

3.88 In the London Plan³⁷, Enfield Borough has a 10 year housing target of 12,460 new homes (1,246 each year) and 3,530 new homes on smaller sites. The Borough must also achieve 195 units per year for older persons. According to the London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (March 2008), Enfield Borough requires one additional pitch³⁸.

3.89 Median house prices in Enfield have been consistently below London's since 2000. Compared to England, the Borough's prices have been higher. Since 2013 Enfield prices have diverged from the England trend and followed the sharp rises observed in the London trajectory³⁹. As of March 2021, the average house price in Enfield is £428,257. While this is lower than the average house price for London at £500,310, it is significantly higher than the average for England at £274,615⁴⁰.

³² Enfield Council (2020) Enfield Borough Profile 2020. [Online] Available at: <https://new.enfield.gov.uk/services/your-council/Borough-and-wards-profiles/Borough-profile-2020-your-council.pdf>

³³ Enfield Council (2020) Enfield Borough Profile 2020. [Online] Available at: <https://new.enfield.gov.uk/services/your-council/Borough-and-wards-profiles/Borough-profile-2020-your-council.pdf>

³⁴ Enfield Council (2020) Enfield Joint Health and Wellbeing Strategy 2020-2023. [Online] Available at: <https://new.enfield.gov.uk/healthandwellbeing/wp-content/uploads/2020/04/LBE-JHWBS-FINAL-V5.0.pdf>

³⁵ Public Health England (2020) Local Authority Health Profile: Enfield. [Online] Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/6/par/E12000007/ati/102/are/E09000010/iid/93347/age/187/sex/4>

³⁶ Enfield Council (2020) Enfield Joint Health and Wellbeing Strategy 2020-2023. [Online] Available at: <https://new.enfield.gov.uk/healthandwellbeing/wp-content/uploads/2020/04/LBE-JHWBS-FINAL-V5.0.pdf>

³⁷ Mayor of London (2021) The London Plan. [Online] Available at: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

³⁸ Fordham Research (2008) London Borough's Gypsy and Traveller Accommodation Needs Assessment. [Online] Available at: https://www.london.gov.uk/sites/default/files/london_boroughs_gypsy_and_traveller_accommodation_needs_assessment_-_final_report_-_2008_-_fordham_research.pdf

³⁹ Enfield Council (2020) Local Housing Needs Assessment 2020. [Online] Available at: <https://new.enfield.gov.uk/services/planning/enfield-local-housing-needs-assessment-full-report-2020-planning.pdf>

⁴⁰ UK House Price Index (2021) [Online] Available at: <https://landregistry.data.gov.uk/app/ukhpi>

3.90 The Borough has a median house prices to income ratio of 14.51 x (workplace-based) and 12.46x (residence-based). The west of the Borough has higher prices than the east and it is notable that there are few wards which contain a mix of high and low values for median prices⁴¹.

3.91 No other updates to the baseline information presented in Appendix A are required in relation to Housing.

Landscape and green infrastructure

3.92 The Enfield Blue and Green Strategy seeks to make Enfield the greenest borough in London by 2031, including through achieving a 25% increase in blue-green infrastructure in Enfield⁴².

3.93 No other updates to the baseline information presented in Appendix A are required in relation to Landscape and green infrastructure.

Transport

3.94 No updates to the baseline information presented in Appendix A are required in relation to Transport.

Water

3.95 Lea Navigation (Enfield Lock to Tottenham Locks) achieved 'Poor' overall status classification in 2019. However, the classification of other watercourses within Enfield remained the same⁴³.

3.96 The Thames Water WRMP 2019 estimates that by 2045 there will be a shortfall of 387 million litres of water per day for the Thames Water supply area, and that by 2100 this will rise to 688 million litres of water per day⁴⁴.

3.97 No other updates to the baseline information presented in Appendix A are required in relation to Water.

Key Sustainability Issues

3.98 Key sustainability issues for Enfield Borough were originally identified through a scoping process in 2020 for the Enfield Local Plan, undertaken by AECOM. These issues have been reviewed and revised in light of the updated baseline information.

3.99 It is also a requirement of the SEA Directive that consideration be given to the likely evolution of the environment in the Plan area (in this case Enfield Borough) if the new Local Plan was not to be implemented. This analysis is also presented in the second column of **Table 3.1** in relation to each of the key sustainability issues.

3.100 The information in **Table 3.1** shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting Enfield Borough would be more likely to continue without the implementation of the new Local Plan, although the policies in the adopted Enfield Core Strategy would still go some way towards addressing many of the issues. In most cases, the new Local Plan offers opportunities to directly and strongly affect existing trends in a positive way, through an up-to-date plan which reflects the requirements of the NPPF.

⁴¹ Enfield Council (2020) Local Housing Needs Assessment 2020. [Online] Available at: <https://new.enfield.gov.uk/services/planning/enfield-local-housing-needs-assessment-full-report-2020-planning.pdf>

⁴² Enfield Council (2020) Enfield's Blue and Green Strategy

⁴³ Environment Agency (2020) Lee Lower Rivers and Lakes [Online] Available at: <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3275>

⁴⁴ Thames Water (2019) Water Resources Management Plan 2019. [Online] Available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/water-resources-management-plan-overview.pdf>

Table 3.1: Key sustainability issues for Enfield Borough and likely evolution without the Local Plan

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
Air quality		
<p>The London Borough of Enfield experiences problems with air quality, particularly between the east and west of the Borough, and to the south. The entire Borough has been declared an AQMA and there are concerns the Ultra-Low Emission Zone in the south of the Borough could potentially result in traffic re-routing in the Borough, which could contribute towards air pollution issues elsewhere. Unenclosed waste facilities in less industrialised areas of the Borough are also expected to contribute towards poor air quality. Of particular concern is the effect future development in LBE could have on the Epping Forest SAC.</p>	<p>The adopted Core Strategy already includes a policy seeking to minimise air pollution and reduce public exposure to pollution, specifically Core Policy 32: Pollution, which requires development to improve air quality by reducing pollutant emissions, particularly in areas identified as having poor air quality. The Development Management Document contains a policy that only permits development if pollution and the risk of pollution is prevented, or reduced and mitigated during all phases of development, namely DMD 64: Pollution Control and Assessment. Similarly, Policy DMD 65: Air Quality stipulates that planning permission will be refused for developments which would have an adverse effect on air quality unless mitigation of these effects has been proposed by the developer. Major developments should be accompanied by an air quality assessment and developments involving sensitive uses should only be permitted if sited away from major sources of pollution. According to the London Plan, development proposals must not lead to further deterioration of existing poor air quality or create an unacceptable risk of high levels of exposure to poor air quality, as set out in Policy SI 1: Improving Air Quality. To achieve this, development proposals should use design solutions that prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.</p> <p>With regard to the Ultra-Low Emission Zone and traffic re-routing, the adopted Core Strategy includes policies encouraging the use of sustainable modes of transport. Core Policy 24: The Road Network encourages sustainable travel choices and reduces growing congestion levels through the promotion of Travel Demand Management Programmes. The Development Management Document already includes a policy, DMD 48: Assessing the Transport Implications of New Development, which seeks to reduce congestion through the production of a travel plan. The London Plan contains a number of policies that encourage uptake of sustainable travel modes by delivering patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. According to the London Plan, development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity, as set out in Policy T4: Assessing and Mitigating Transport Impacts. The policy states that where appropriate, mitigation will be required to address adverse transport impacts.</p> <p>With respect to the Epping Forest SAC, pressures on the natural environment are likely to continue regardless of the adoption of the Local Plan, although the Core Strategy, Development</p>	<p>IIA objective 11: Air pollution</p>

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
	<p>Management Document and London Plan already include policies seeking to address these pressures. Core Policy 36: Biodiversity seeks to protect, enhance, restore or add to biodiversity interests within the Borough with specific reference to European sites. Similarly, Policy DMD 78: Nature Conservation in the Development Management Document stipulates that development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided and it has been demonstrated that appropriate mitigation can address the harm caused.</p> <p>While such policies would continue to apply in the absence of the Local Plan, there is an opportunity to tailor policies to directly address the east and west divide, as well as the air quality issues in the south of the Borough, which has been declared an AQMA, for example by encouraging walking, cycling and public transport rather than the private car. The Local Plan also offers the opportunity to build on these overarching policies through more specific policy wording that references the Epping Forest SAC.</p>	
Biodiversity		
<p>The Borough contains a number of designated and non-designated biodiversity assets which are experiencing recreational use pressures, as well as poor air quality, particularly the Epping Forest SAC. Ecological connectivity across the Borough could be improved, in addition to the ecological status of watercourses. Responsible management of sensitive wetlands is required at Lee Valley Regional Park, in addition to improved access.</p>	<p>Pressures on the natural environment are likely to continue regardless of the adoption of the Local Plan, although the Core Strategy, Development Management Document and London Plan already include policies seeking to address these pressures. Core Policy 36: Biodiversity seeks to protect, enhance, restore or add to biodiversity interests within the Borough, which includes European sites, SSSIs, SINCs and Priority Habitats, whilst Core Policy 32: Pollution seeks to improve air quality by reducing pollutant emissions, particularly in areas identified as having poor air quality. Policy DMD 78: Nature Conservation in the Development Management Document stipulates that development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided and it has been demonstrated that appropriate mitigation can address the harm caused. Policy DMD 64: Pollution Control and Assessment only permits development if pollution and the risk of pollution is prevented or reduced and mitigated during all phases of development. According to Policy G6: Biodiversity and access to nature in the London Plan, SINCs should be protected and where harm to a SINC is unavoidable, the mitigation hierarchy should be applied to minimise development impacts: (1) avoid damaging the significant ecological features of the site; (2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site; and (3) deliver off-site compensation of better biodiversity value. With regard to air quality, Policy SI 1: Improving air quality stipulates that development proposals should not lead to further deterioration of existing poor air quality.</p>	<p>IIA objective 13: Biodiversity</p>

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
	<p>With respect to the Lee Valley Regional Park, the adopted Core Strategy already includes policies seeking to provide effective links to the Park. Core Policy 35: Lee Valley Regional Park and Waterways seeks to improve access to the Park, particularly from residential communities to its west, focusing on two key areas: Ponders End and Central Leaside. The policy states that the Council will support the work of Lee Valley Regional Park Authority to realise the potential of the Park, whilst also making best use of the waterway network, seeking to fully restore the waterways and improve their pathways. The Core Strategy also contains a policy seeking to protect and enhance water quality, namely Core Policy 32: Pollution, which seeks to ensure that water quality is not compromised by new development and secures, where appropriate, improvements to water quality. As set out in the policy, the Council will work with partners, particularly the Environment Agency, to seek improvements to the water environment in adherence with the Water Framework Directive and as per the programme of measures set within the Thames River Basin Management Plan. Policy DMD 70: Water Quality in the Development Management Document does not permit development that would adversely affect water quality.</p> <p>The Local Plan presents an opportunity for new development to come forward at the most appropriate locations in order to avoid detrimental impacts on biodiversity assets and the water environment, as well as up to date planning policy in relation to future policy direction with specific reference to the Epping Forest SAC. It also provides the opportunity to further promote Lee Valley through new access points, in addition to improving existing ones, whilst also working on improving the ecological status of watercourses. The Local Plan can also promote sustainable drainage and green/blue infrastructure that enables natural cleaning processes to take place (e.g. reed beds) while also serving as a habitat for wildlife.</p>	
Climate change adaptation		
<p>Climate change is likely to increase temperatures and the subsequent risk of flooding and summer droughts. This is particularly the case in the Borough, where the urban heat island effect results in summer temperatures up to 10°C warmer than more rural areas around Greater London, with the effects of heat more pronounced in the east of LBE, which could</p>	<p>Climate change is likely to have ongoing effects regardless of the adoption of the Local Plan, although the Core Strategy, Development Management Document and London Plan already include policies seeking to respond to this issue, and these could continue to apply in the absence of the Local Plan. Core Policy 20: Sustainable Energy Use and Energy Infrastructure in the Core Strategy requires all new developments and, where possible via a retrofitting process in existing developments, to address the impacts of climate change by minimising energy use, supplying energy efficiently, and using energy generated from renewable sources. According to the policy, the Council will support appropriate measures to adapt to the impacts of climate change and will reduce emissions of carbon dioxide as part of development proposals. The Development Management Document contains a number of climate change policies, which require all new development to achieve the highest sustainable design and construction</p>	<p>IIA objectives 2: Climate change adaptation and 17: Flooding</p>

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
<p>worsen as a result of increased urbanisation. Fluvial flood risk provides the greatest flood risk concern and is concentrated in the east of the Borough along the River Lee.</p>	<p>standards and to include measures capable of adapting to climate change. All development proposals are required to demonstrate how they minimise energy related CO₂ emissions. Where major developments have secured all possible savings through energy efficiency and decentralised energy networks and still fail to achieve the specified carbon dioxide reductions targets, they will be required to provide on-site renewable energy generation through the use of low and zero carbon technologies. The London Plan also contains a number of policies that seek to minimise greenhouse gas emissions, including Policy 21 4: Managing Heat Risk which relates to the urban heat island effect and minimising this effect through design, layout, orientation, materials and the incorporation of green infrastructure.</p> <p>With respect to fluvial flood risk, Core Policy 28: Managing Flood Risk Through Development diverts development to areas of low flood risk, whilst Core Policy 29: Flood Management Infrastructure seeks to maintain and enhance the Borough's existing flood defence infrastructure. Policy DMD 59: Avoiding and Reducing Flood Risk in the Development Management Document requires development to avoid and reduce the risk of flooding, at the same time as not increasing flood risk elsewhere. The London Plan contains Policy SI 12: Flood Risk Management which requires development proposals to make space for water and for development to be set back from the banks of watercourses. Development proposals adjacent to flood defences are required to protect the integrity of flood defences and allow access for future maintenance and upgrading.</p> <p>While these policies would continue to apply in the absence of the Local Plan, there is an opportunity to build on these overarching policies through more specific policies and site allocations that are selected following consideration of their risk of flooding, particularly in areas of the Borough that are most vulnerable to flooding. The Local Plan may also offer opportunities to encourage flood management through the green/blue infrastructure network and sustainable drainage systems.</p>	
Climate change mitigation		
<p>While CO₂ emissions have fallen in LBE, the Council has declared a climate emergency and will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040. To meet this, the Borough will need to minimise the need to travel and reduce emissions</p>	<p>The Core Strategy, Development Management Document and London Plan all contain policies that seek to reduce CO₂ emissions, particularly those associated with the private car. Core Policy 24: The Road Network states that the Council will encourage sustainable travel choices and support the use of low carbon vehicles, including electric vehicles. Core Policy 25: Pedestrians and Cyclists makes provision for safe, convenient and accessible routes for pedestrians, cyclists and other non-motorised modes, whilst Core Policy 26: Public Transport seeks to secure a comprehensive, safe, accessible, welcoming and efficient public transport network. In the Development Management Document, Policy DMD 48: Transport Assessments</p>	<p>IIA objectives 1: Climate change mitigation and 12: Sustainable transport</p>

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
<p>associated with the built environment.</p>	<p>requires all major development proposals to be accompanied by a transport assessment and where relevant, a travel plan, which identifies the need to improve modal choice, pedestrian accessibility, minimise congestion or reduce pollution. The London Plan requires development proposals to reduce the dominance of vehicles on London's streets and to be permeable by foot and cycle, whilst also connecting to local walking and cycling networks, as well as public transport.</p> <p>Core Policy 20: Sustainable Energy Use and Energy Infrastructure addresses the causes of climate change, as well as the impacts mentioned above under 'Climate change adaptation'. According to this policy, development proposals must reduce carbon dioxide emissions. Similarly, Policy DMD 49: Sustainable Design and Construction Statements requires all development to mitigate and adapt against climate change.</p> <p>Without the emerging Local Plan, climate change will continue. However, the policies outlined above would help in terms of mitigation. The Local Plan provides an opportunity to strengthen policies which act positively with respect to climate change, especially those that limit the need to travel through the appropriate siting and design of new development, or which encourage electric vehicle uptake in place of petrol and diesel fuelled vehicles, and which make provision for renewable energy generation.</p>	
Communities		
<p>The Borough is characterised by an east-west divide in terms of inequality and deprivation.</p>	<p>Core Policy 9: Supporting Community Cohesion states that the Council will work with partners to promote community cohesion by supporting area based policy interventions relating to the place shaping agenda, both of which seek to tackle social disadvantage. Further to this, the policy requires the provision of necessary community facilities (Core Policies 37-45) to support local need, whilst also actively encouraging participation by all members of the community in planning and decision making processes. With respect to education, Core Policy 8: Education supports and encourages the provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough. Core Policy 7: Health and Social Care Facilities and the wider determinants of health also seeks to provide the health and social care facilities required by residents, so as to improve overall health and reduce inequalities. Policies DMD 16: Provision of New Community Facilities and DMD 17: Protection of Community Facilities support the retainment or provision of community facilities in areas where there is a demonstrated need. The London Plan also contains a number of policies on social infrastructure, which help to reduce inequalities between different areas across Greater London.</p>	<p>IIA objectives 6: Social inclusion and 4: Health and wellbeing</p>

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
	<p>Enfield is one of the 20% most deprived local authorities in England. Life expectancy is 8.8 years lower for men and 5.7 years lower for women in the most deprived areas of LBE than in the least deprived areas. Additionally, around 22.2% (16,667) children live in low income families. 10 LSOAs within the Borough fall within the top 10% most deprived LSOAs nationally. Without the Local Plan, these issues are likely to continue. It is recognised that the Local Plan is only part of the solution to tackling deprivation and that there are a range of factors that may need to be addressed outside the scope of the Local Plan.</p>	
Crime and community safety		
<p>Crime is a problem experienced across the Borough but particularly in the south east, where serious youth violence and knife crime are prominent. Drug dealing and prostitution are related serious issues in the Borough, in addition to road safety for pedestrians and cyclists.</p>	<p>Core Policy 9: Supporting Community Cohesion states that the Council will work with its partners to promote community cohesion by contributing towards reducing crime, fear of crime and anti-social behaviour by using design principles that create environments which promote community safety and discourage offending. Core Policy 30: Maintaining and Improving the Quality of the Built and Open Environment requires all developments and interventions in the public realm to be high quality and design-led, with reference to safe, accessible, inclusive and sustainable neighbourhoods. Policy DMD 34: Evening Economy in the Development Management Document supports an evening economy, provided there is an active ground floor street frontage and measures are in place to address issues such as community safety, policing and litter. Policy DMD 37: Achieving High-Quality and Design-Led Development also looks at the quality of the public realm and ensuring it is safe, attractive, uncluttered and effective. The policy specifically states that all development should create safe and secure places and comply with the principles of Secured by Design.</p> <p>With respect to road safety, a number of policies seek to foster road safety, including Core Policy 25: Pedestrians and Cyclists, by implementing 'Streets for People' initiatives. Similarly in the Development Management Document, Policy DMD 39: The Design of Business Premises, makes reference to creating a pleasant and safe environment for pedestrians, cyclists and vehicles at all times of the day. So too does Policy DMD 45: Parking Standards and Layout.</p> <p>The Local Plan is unlikely to affect levels of crime directly. However, by providing for development opportunities that generate jobs, affordable housing, and community facilities within more deprived communities, some of the causes of crime can be addressed. In addition, it is possible through good design of developments to further reduce the opportunities for crime, for example through appropriate lighting, natural surveillance via 'eyes on the street', security measures, etc.</p>	<p>IIA objectives 7: Crime and community safety and 8: Road safety</p>

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
Economy and employment		
<p>Education and skills provision could further meet the needs of Enfield's existing and future labour market, improving life chances for all, including by enabling older people and people with physical and mental health conditions to stay in employment.</p>	<p>The Core Strategy already includes policies seeking to protect and improve LBE's employment offer, with a particular focus on the Strategic Industrial Locations (SILs) and the Locally Significant Industrial Sites (LSIS). With regard to education and skills development, Core Policy 16: Taking Part in Economic Success and Improving Skills encourages the Borough's colleges and work-based learning providers to deliver vocational lines of learning, whilst also exploring the possibility of establishing a new higher education/further education campus within the Upper Lee Valley. According to the policy, the Council will also work with partners to develop local employment partnerships and concentrate available resources in priority areas, so as to reach hard-to-serve populations and target the most disadvantaged areas. Core Policy 8: Education relates to the latter policy in seeking to support and encourage provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough. Facilities will also be provided for further and adult education to develop and improve the skills of the existing and future workforce. In the Development Management Document, Policy DMD 23: New Employment Development encourages new industrial development, particularly within SILs and LSIS, whilst DMD 24: Small Businesses supports the provision of small business units suitable for start-ups.</p> <p>The greatest influence on educational attainment in the Borough is the provision of quality teaching and supportive community and family environments. Planning has a role to play by facilitating the delivery of educational establishments and capacity to meet anticipated growth in demand for places, and that the educational establishments are of a high standard of design and easy and safe to access. While the above policies would continue to apply in the absence of the Local Plan, opportunities may exist to build on these overarching policies by helping to address the specific education and skills gaps in LBE by facilitating proposals for appropriate educational facilities.</p>	<p>IIA objectives 9: Economy, 10: Town and local centres and 5: Services and facilities</p>
Health		
<p>Health issues reflect the east-west divide, with a lower life expectancy in the east of the Borough when compared to the west. LBE experiences flagship health issues revolving around air quality, obesity and food deprivation, in addition to</p>	<p>The adopted Core Strategy includes a number of policies that already seek to address the most prominent identified health issues within LBE, including encouraging healthy lifestyles such as walking and cycling, and improving accessibility to green and open spaces. This includes Core Policy 25: Pedestrians and Cyclists, which seeks to provide safe, convenient and accessible footpaths and cycleways in order to encourage more active modes of travel, Core Policy 32: Pollution, which seeks to improve air quality by reducing pollutant emissions and exposure to pollution in the Borough, and Core Policy 34: Parks, Playing Fields and other open spaces,</p>	<p>IIA objectives 4: Health and wellbeing and 6: Social inclusion</p>

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
<p>access to green spaces. There are also deficiencies in the Borough's health infrastructure with inadequate GP facilities, cross boundary pressure on health services and issues around primary health services.</p>	<p>which sets out to protect and enhance existing open spaces, as well as to improve the provision of accessible open space in the Borough. The Development Management Document also includes policies that would address health issues within the Borough. Policy DMD 16: Provision of New Community Facilities would encourage more active modes of transport such as walking and cycling over the use of private vehicles, which would address issues relating to obesity, while Policy DMD 65: Air Quality seeks to prevent adverse impacts on air quality in the Borough. In addition, Policy DMD 85: Land for Food and Other Agricultural Uses supports the use of land for growing food, which would directly address the issue of food deprivation in the Borough.</p> <p>In the London Plan, Policy S2: Health and Social Care Facilities seeks to ensure that boroughs identify and address local health care needs. The London Plan also contains a number of policies that address the provision of open space and green infrastructure, including policy GG2: Making the Best Use of Land, which seeks to protect and enhance London's open spaces, Policy GG3: Creating a Healthy City, which seeks to improve access to green spaces and the provision of green infrastructure, Policy G1: Green Infrastructure, and Policies G3: Metropolitan Open Land and G4: Open Space. Policy S5: Sports and Recreation Facilities would also help address issues with obesity. Policy SI 1: Improving Air Quality directly addresses air pollution issues in the Borough, while policy T2: Healthy Streets promotes more active travel modes to improve emissions and reduce health inequalities.</p> <p>The Core Strategy contains a policy that seeks to retain existing health and social care provision in the Borough, as well as deliver new facilities in order to address deficiencies in the Borough's health infrastructure. Core Policy 7: Health and Social Care Facilities and the wider determinants of health seeks to prioritise this delivery in the east of the Borough and sets out the infrastructure requirements of the Borough over the plan period. Policy GG3: Creating a Healthy City in the London Plan seeks to ensure that development helps to reduce health inequalities by planning for appropriate health infrastructure. In addition, Policy D2: Infrastructure Requirements for Sustainable Densities seeks to ensure that infrastructure in the London boroughs has sufficient capacity to support proposed densities.</p> <p>While such policies would continue to apply in the absence of the Local Plan and services and facilities would likely still be retained and provided, there is an opportunity to build on these overarching policies through more specific policies, and by seeking to deliver development that meets the needs of the more deprived communities in the Borough. There is also an opportunity to address the disparity between the east and west of the Borough more directly by addressing the identified flagship health issues.</p>	
Heritage and townscape		

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
<p>LBE has a rich variety of designated heritage assets, all of which are continuously facing pressures for change, often indirectly, and from inappropriate development and activity affecting their setting and context.</p>	<p>The adopted Core Strategy already includes policies seeking to protect and enhance the historic environment, including Core Policy 31: Built and Landscape Heritage, which seeks to pro-actively preserve and enhance heritage assets within the Borough. Several policies within the Development Management Document already require development to have particular consideration for local distinctiveness and historic character in the Borough, such as Policy DMD 44: Conserving and Enhancing Heritage Assets. The document also includes Policies DMD 37: Achieving High Quality and Design-Led Development and DM 43: Tall Buildings, which seek to prevent inappropriate development that may result in adverse impacts on heritage assets. The London Plan contains a number of policies within Chapter 7: Heritage and culture, which aim to ensure that development is particularly considerate of heritage and cultural assets, including Policy HC1: Heritage Conservation and Growth, HC2: World Heritage Sites, HC3: Strategic and Local Views, and HC4: London View Management Framework which seeks to protect and enhance the characteristics and composition of strategic views and their landmark elements. Policy GG5: Growing a Good Economy within the London Plan also promotes the consideration of heritage assets in Greater London.</p> <p>While these policies would continue to apply in the absence of the Local Plan, opportunities to address the historic environment through specific policies and site allocations are likely to exist taking into account their impacts on the historic environment. Furthermore, the Local Plan will be able to be tailored to LBE's historic townscape and landscape setting.</p>	<p>IIA objective 14: Historic environment</p>
<p>Housing</p>		
<p>The London Plan significantly raises Enfield's housing targets to a ten year target of 12,460, which equates to 1,246 dwellings per annum. LBE has the potential to be a continued focus for housing delivery at scale; however, it will be important to balance this with the delivery of a range of types and tenures in the area to meet localised needs, specifically the needs of families that require affordable family sized homes. The 2015 SHMA identifies the need for</p>	<p>The Core Strategy already includes a number of policies which seek to address the supply of housing in the Borough to meet the housing target set out in the London Plan. Core Policy 2: Housing Supply and Locations for New Homes makes provision for 11,000 new homes within broad locations in the Borough, over the fifteen year period of the Core Strategy time frame, from 2010/11 to 2024/25. Core Policy 3: Affordable Housing seeks to achieve a Borough-wide target of 40% affordable housing units in new developments. Core Policy 5: Housing Types seeks to ensure the delivery of a range of housing sizes to meet the needs of the Borough, with particular consideration for affordable homes for families. The Development Management Document already contains a number of policies within Chapter 2: Housing, that address the provision of affordable housing in the Borough with a mix of housing sizes that can accommodate families, and also includes an affordable housing target of 40%.</p> <p>A number of policies within Chapter 4: Housing of the London Plan already address the provision of housing in the Borough, including H1: Increasing Housing Supply, H2: Small Sites, H3: Meanwhile Use. As Housing and H9: Ensuring the Best Use of Stock, which seek to promote the</p>	<p>IIA objectives 3: Housing and 6: Social inclusion</p>

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
<p>50% affordable (rented and market) housing in the Borough; however, recent affordable housing delivery is below policy target, achieving 40% instead of the 50% target. While there is a need to provide more housing simply to match the growing population, it is imperative that this housing be affordable.</p>	<p>efficient use of existing housing stock to reduce the number of vacant and under-occupied dwellings. Furthermore, Policy H10: Housing Size Mix already seeks to provide an appropriate mix of housing sizes and range of tenures to meet the needs of the Borough. Several policies within the London Plan seek to ensure the sufficient delivery of homes and the provision of affordable housing in the Borough, including Policy GG4: Delivering the Homes Londoners Need, Policy GG5: Growing a Good Economy, Policy H4: Delivering Affordable Housing, which aims to deliver 50% of all new homes in London as affordable housing, as well as H5: Threshold Approach to Applications, H6: Affordable Housing Tenure, H7: Monitoring of Affordable Housing and H8: Loss of Existing Housing and Estate Redevelopment.</p> <p>Pressures to deliver affordable housing are likely to continue regardless of the adoption of the Local Plan, although the documents mentioned above already contain policies that aim to address these pressures. Having said that, the supply of housing provided by these policies is likely to fall short of the housing targets set out in the London Plan. The Local Plan would therefore provide an opportunity to ensure a sufficient supply of housing in the Borough to meet the growing demand over the Plan period. The Local Plan provides an opportunity to facilitate the delivery of affordable housing to meet the growing need identified in the SHMA, whilst also supporting the provision of a more appropriate range of housing to meet the mixed needs of the population, with particular provision for family sized homes.</p>	
Landscape and green infrastructure		
<p>There are a number of valued landscapes within LBE that fall within the Green Belt, including designed landscapes and extensive semi-rural landscape character areas, all of which need to be protected.</p>	<p>The adopted Core Strategy contains a policy which ensures that Enfield's Green Belt is protected and enhanced, namely Core Policy 33: Green Belt and Countryside. Policies DMD 82: Protecting the Green Belt and DMD 83: Development Adjacent to the Green Belt in the Development Management Document also address the need to conserve the Green Belt within LBE. The document also contains policies that directly address the protection of specific, distinct and valued landscapes in the Borough, including DMD 84: Areas of Special Character, DMD 90: Appropriate Uses in the Crews Hill Defined Area and DMD 91: Improving the General Appearance of the Crews Hill Defined Area, which recognises Enfield's horticultural traditions and gives particular consideration to the Crews Hill area. Policy G2: London's Green Belt in the London Plan already includes protection for the Green Belt from development and supports the enhancement of the Green Belt for multi-functional uses.</p> <p>Without the Local Plan, such policies would continue to apply and provide protection and enhancement for the Green Belt, designated landscapes and landscape character areas within the Borough. However, the Local Plan provides an opportunity to build on these policies as well</p>	<p>IIA objective 15: Landscape and townscape and IIA objective 16: Efficient use of land and materials</p>

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
	<p>as tailor policies to directly address the protection of designed landscapes and landscape character areas in the north of the Borough, where most are located.</p>	
<p>There is an identified imbalance of green space availability between the east and west of the Borough, which could be addressed through increased accessibility and availability to open space, particularly the Lee Valley Regional Park in the east of the Borough</p>	<p>The adopted Core Strategy includes Core Policy 34: Parks, Playing Fields and other Open Spaces, which seeks to protect and enhance existing open spaces, as well as improve the provision of accessible open space in the Borough. It also contains Core Policy 35: Lee Valley Regional Park and Waterways which gives particular consideration to the Lee Valley Regional Park and aims to improve access to the park and restore and improve the waterways and footpaths in the area. The Development Management Document contains a number of policies that already provide protection, enhancement and provision of public open space and access to Green Infrastructure, including DMD 71: Protection and Enhancement of Open Space, DMD 72: Open Space Provision, DMD 73: Children's Play Space, DMD 74: Playing Pitches, and DMD 77: Green Chains.</p> <p>The London Plan contains several policies that address the provision of open spaces and green infrastructure in the Borough, including Policy GG2: Making the Best Use of Land, which seeks to protect and enhance London's open spaces, Policy GG3: Creating a Healthy City, which seeks to improve access to green spaces and the provision of green infrastructure, Policy G1: Green Infrastructure, which addresses the protection and enhancement of open spaces and green infrastructure in the Borough and states how these assets should be planned, designed and managed. Policies G3: Metropolitan Open Land and G4: Open Space also provide opportunities for the provision and protection of open spaces, as well as access to open spaces by assigning Metropolitan Open Land, which is afforded the same level of protection as Green Belt and ensuring that development addresses open space deficiencies in LBE, respectively.</p> <p>Although these policies will remain in the absence of the Local Plan, imbalances between the availability and accessibility of green space between the east and west of the Borough will have been further highlighted by the Covid-19 pandemic. The Covid-19 pandemic has brought to light the importance of healthy living environments, access to nature and outdoor space, and the ability to exercise. The Local Plan provides an opportunity to tailor policies to directly address this east-west imbalance.</p>	<p>IIA objective 4: Health and wellbeing</p>
<p>Transport</p>		
<p>There are a number of issues relating to transport within LBE. Census data from 2011 indicates that the majority of residents use a</p>	<p>The Core Strategy already includes a number of core policies that aim to address existing deficiencies in sustainable transport infrastructure in the Borough and ensure that planned growth is supported by adequate transport infrastructure. This includes Core Policy 25: Pedestrians and Cyclists, which encourages the use of sustainable modes of transport and</p>	<p>IIA objectives 12: Sustainable transport, 11: Air pollution</p>

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
<p>private car to get to work instead of public transport, implying that accessibility and availability to active and public transport is a potential issue in the Borough. There is an identified transport infrastructure severance between the east and the west of the Borough, which likely exacerbates this issue.</p>	<p>seeks to provide safe, convenient and accessible routes for pedestrians and cyclists. Core Policy 26: Public Transport seeks to ensure a comprehensive, accessible and efficient transport network within the Borough that encourages the use of bus and rail transport systems, while Core Policy 27: Freight promotes the potential for freight movement by rail and water over the use of roads. The Development Management Document contains several policies relating to transport provision in LBE, such as Policy DMD45: Parking Standards and Layout, which ensures particular consideration for car parking proposals in the Borough against the public transport accessibility of the site in order to encourage the use of public transport over private vehicles and supports residential development in close proximity to a designated town centre in order to reduce the need to travel. Policy DMD47: Access, New Roads and Servicing ensures that developments include provision for pedestrian and cyclist access, while both Policy DMD47 and Policy DMD48: Transport Assessments seek to ensure that public transport use as a result of development is sustainable. Chapter 10 of the London Plan, 'Transport', includes a number of policies which seek to address issues relating to transport capacity, connectivity and the use of sustainable transport modes in the Borough. These policies aim to encourage walking, cycling and public transport use through the provision and improvement of new and existing transport infrastructure.</p> <p>While such policies could continue to apply in the absence of the Local Plan, there is an opportunity to directly address the east and west divide in the Borough through policy which can improve public transport connections and directly address inefficiencies in sustainable transport infrastructure.</p>	<p>and 1: Climate change mitigation</p>
Water		
<p>LBE is located within an area of water stress where demand is high and supply is subject to constraints. The Borough is serviced by the Deephams STW, which will need significant upgrade in order to continue to service a growing population.</p>	<p>The adopted Core Strategy contains a policy that seeks to ensure that Enfield's future water resource needs are managed effectively, and that water supply is considered with development to accommodate the growth anticipated in the Borough. Core Policy 21: Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure promotes sustainable design and construction for water conservation and efficiency measures in new and existing developments. The policy specifically states that in order to improve water quality in the Borough, Thames Water Utilities Ltd plan to improve/redevelop Deephams Sewage Treatment Water Works. The Development Management Document contains Policy DM58: Water Efficiency which requires all new development to adhere to limits on water usage and maximise water efficiency to conserve water. The policy also encourages new development to undertake a rainwater and greywater use feasibility study in order to promote the collection of rainwater and reuse of greywater in new development. The London Plan contains two policies regarding water supply, namely Policy SI 5: Water Infrastructure and Policy SI 13: Sustainable Drainage, which similarly seek to maximise</p>	<p>IIA objective 18: Water</p>

Key sustainability issues for Enfield	Likely evolution without the Local Plan	Relevant IIA objectives
	<p>water use efficiency and promote improvements to water supply infrastructure to contribute to the security of water supply, as well as ensure efficient surface water management.</p> <p>Although there are a number of existing policies that address the Borough's water resources which would continue to apply in the absence of the Local Plan, there is an opportunity to build on these overarching policies through more specific policy wording that addresses the insufficient supply of water in the Borough and the provision of water infrastructure and upgrades to water resource services, specifically Deephams STW.</p>	
<p>There are a number of water quality issues that impact the Borough, with none of the main watercourses currently meeting the Water Framework Directive (WFD) required ecological status of 'Good'. The Borough is also covered by a number of Source Protection Zones (SPZs) that may be at risk of potential contamination.</p>	<p>In order to improve water quality within the Borough, Policy 21: Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure in the Core Strategy ensures that Enfield's wastewater treatment and drainage infrastructure requirements are implemented in tandem with planned growth within the Borough. The Policy also encourages the incorporation of sustainable drainage measures within new development as a means to manage surface water run-off. The adopted Core Strategy also includes Core Policy 32: Pollution, which seeks to minimise water pollution and secure improvements to water quality, with particular regard for adherence to the Water Framework Directive as set out within the Thames River Basin Management Plan. The Development Management Document contains a number of policies that address the protection and enhancement of water quality in the Borough. Policy DM61: Managing Surface Water requires all developments to implement a Drainage Strategy to demonstrate the use of Sustainable Urban Drainage Systems to prevent water pollution and protect, and where possible, enhance water quality. The Document also contains Policy DM63: Protection and Improvement of Watercourses and Flood Defences, which requires development to not result in the deterioration of a watercourse, and Policy DM70: Water Quality, which seeks to prevent development that will adversely impact water quality in the Borough, including waterways, SPZs and Aquifers. The London Plan contains Policies SI 5: Water Infrastructure and SI 13: Sustainable Drainage, which both seek to promote the protection and improvement of water quality in the Borough through the support of wastewater treatment infrastructure investment and sustainable surface water management, respectively.</p> <p>While such policies would continue to apply in the absence of the Local Plan, there is an opportunity to directly address the water quality of the main watercourses in the Borough that have been identified as not having met the water quality standards set by the WFD. The Local Plan also provides the opportunity to address the implications of the UK's departure from the EU on water quality in LBE and provide more specific policy wording to promote the protection and enhancement of water quality with particular regard to the SPZs within the Borough.</p>	<p>IIA objective 18: Water</p>

The IIA framework

3.101 As described in the Methodology chapter, the relevant objectives established via the review of plans, policies and programmes, and the key sustainability issues identified by AECOM's baseline review, informed the framework of IIA objectives developed by AECOM, the IIA framework, against which the Plan has been assessed. The IIA framework is presented below in **Table 3.2**.

Table 3.2: IIA framework

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (<i>and coverage of HIA, EqIA and CSIA</i>)
<p>IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO₂ emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040.</p>	<p>Minimise greenhouse gas emissions from industrial and commercial activities?</p> <p>Improve strategic public transport infrastructure?</p> <p>Ensure a complementary mix of land uses within compact communities that minimises the length of journeys to services and facilities, in addition to employment opportunities?</p> <p>Increase the proportion of journeys made on foot or by cycle, and developments are of a sufficient density to support and enhance local services and public transport provision?</p> <p>Provide roadside green infrastructure, particularly trees, which could help absorb carbon dioxide?</p> <p>Sustainable transport is addressed separately under IIA objective 12.</p>	<p>Climatic factors</p> <p>Air</p>
<p>IIA objective 2: Ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought.</p>	<p>Require the incorporation of sustainable design and construction techniques in development?</p> <p>Ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?</p> <p>Reduce the risk of damage to people, property and infrastructure from extreme weather events?</p> <p>Flood risk is addressed separately under IIA objective 17.</p>	<p>Climatic factors</p> <p>Human health</p> <p>Biodiversity, flora and fauna</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p>
<p>IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including</p>	<p>Provide for a range of housing type and tenures to meet identified housing needs?</p> <p>Provide affordable housing to meet identified needs?</p> <p>Address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?</p> <p>Provide specialist accommodation for those with disabilities?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (<i>and coverage of HIA, EqIA and CSIA</i>)
housing for the elderly and disabled people.	Make provision for homes that can be adapted to support independent living for older and disabled people?	
IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough.	<p>Improve access to healthcare and provide new or enhanced local health services to support new and growing communities?</p> <p>Contribute to narrowing health inequalities?</p> <p>Improve access to outdoor and indoor sport and leisure facilities, in addition to recreation facilities?</p> <p>Improve access to open space and the countryside, including Lee Valley Regional Park, recognising its sensitivity to human disturbance?</p> <p>Provide, steward and maintain green infrastructure assets and networks, ensuring that these are linked into new and existing developments, to improve the connectivity of green space and green networks?</p> <p>Limit the risk of air, noise and light pollution on local people?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.	<p>Will it maintain and improve access to key services and facilities for all sectors of the population? / Ensure proposals retain or re-provide existing social infrastructure?</p> <p>Will it improve access to community facilities?</p> <p>Make provision for religious places of worship?</p> <p>Provide new and improved education facilities, which will support raising attainment and the development of skills, leading to a work ready population of school and college leavers?</p> <p>Improve educational attainment, qualification levels and participation in education and training?</p> <p>Access to more general services and facilities is addressed separately under IIA objective 10.</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
IIA objective 6: Encourage social inclusion, promotion of	Reduce poverty and social exclusion in those areas most affected?	<p>Population</p> <p>Human health</p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (and coverage of HIA, EqIA and CSIA)
equality and a respect through diversity.	<p>Develop social cohesion through good urban design, using the healthy streets indicators and community spaces that act as a catalyst for community cohesion?</p> <p>Make provision for open space within town centres and new developments, encouraging interaction amongst residents?</p> <p>Make the public realm safe and attractive to use by pedestrians?</p>	<p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
IIA objective 7: Reduce crime and increase community safety.	<p>Support targeted interventions to reduce crime and increase community safety, guided by LBE's Crime and Community Safety team, and ensure high quality new developments that are future proofed?</p> <p>Reduce levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting, etc.?</p> <p>Encourage access to, and the provision of, community and youth facilities in more deprived neighbourhoods?</p> <p>Increase the perception of safety from crime?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Community Safety Impact Assessment</i></p>
IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety.	<p>Apply healthy streets principles to ensure pedestrians and cyclists can travel safely?</p> <p>Ensure safe street design so as to encourage walking and cycling?</p>	<p>Population</p> <p>Human health</p> <p><i>Health Impact Assessment</i></p>
IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all.	<p>Support the growth of Strategic Industrial Locations and Locally Significant Industrial Sites?</p> <p>Ensure a sufficient supply of land to meet local employment needs?</p> <p>Provide opportunities for start-up companies and expansion of local companies, particularly in high-performance technologies, business and professional services?</p> <p>Help diversify employment opportunities locally, including employment within the social enterprise, voluntary and community sectors and a growing higher wage economy?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (<i>and coverage of HIA, EqIA and CSIA</i>)
	Improve access to jobs for local people from all sectors of the community that will reduce inequality between standards of living?	
IIA objective 10: Support the vitality of the Borough's town and local centres.	<p>Enhance the vitality and vibrancy of town and local centres?</p> <p>Encourage the retention of and expansion of town and local centre commercial and retail uses?</p> <p>Provide for a range of homes within the town and local centres?</p> <p>Promote regeneration in the Borough?</p> <p>Provide, protect or enhance locations for cultural activities, including the arts?</p>	<p>Population</p> <p>Material assets</p>
IIA objective 11: Minimise air pollution.	<p>Protect and improve air quality in the Borough which is entirely designated as an Air Quality Management Area (AQMA)?</p> <p>Support reduced air pollution in existing hotspots and avoid the creation of new air pollution hotspots, contributing to the achievement of the national and London-wide targets.</p> <p>Minimise air pollution caused by traffic and commercial uses?</p> <p>Address traffic congestion within the Borough and along key routes through neighbouring areas, with a focus on emission reduction, health impacts and the delivery of pedestrian friendly urban design?</p> <p>Mitigate the impacts of unenclosed waste facilities on dust and particulate pollution in less industrialised areas?</p>	<p>Air</p> <p>Human health</p> <p><i>Health Impact Assessment</i></p>
IIA objective 12: Minimise the need to travel and support a modal shift away from the private car.	<p>Make provision for safe and easy access to public transport services?</p> <p>Promote and facilitate the use of electric cars and sustainable modes of transport?</p> <p>Promote compact, mixed-use development, which encourages walking and cycling for short journeys?</p>	<p>Population</p> <p>Air</p> <p>Human health</p> <p>Climatic factors</p> <p>Material assets</p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (<i>and coverage of HIA, EqIA and CSIA</i>)
		<i>Health Impact Assessment</i>
<p>IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks.</p>	<p>Maintain the integrity of the Epping Forest SAC?</p> <p>Protect locally designated and non-designated biodiversity sites from both the direct and indirect adverse effects of development?</p> <p>Avoid impacts of development and human disturbance on Lee Valley Regional Park?</p> <p>Safeguard and strengthen local ecological/green infrastructure networks that contribute to ecological connectivity both within Enfield Borough and their links with ecological networks in neighbouring boroughs?</p> <p>Deliver targeted enhancements that improve the functioning of networks and are supportive of established conservation objectives?</p> <p>Ensure that known biodiversity of brownfield sites is given due weight reflecting its ecological interest and value?</p> <p>Deliver biodiversity net gain through individual development contributions?</p> <p>Take into account opportunities to enhance biodiversity in the layout and design of development, including allowing species to adapt to climate change?</p>	<p>Biodiversity, flora and fauna</p>
<p>IIA objective 14: Sustain and enhance the significance of heritage assets.</p>	<p>Support the integrity, special interest, character, appearance and historic setting of historic settlements and heritage assets, both designated and non-designated?</p> <p>Facilitate enhancements to the fabric and setting of the historic environment?</p> <p>Support access to, interpretation and understanding of the historic environment (including through investigations and studies which better reveal the significance of archaeological assets)?</p> <p>Protect, maintain and enhance scheduled monuments and archaeological sites, and their setting?</p> <p>Protect, maintain and enhance registered parks and gardens, and their settings?</p>	<p>Cultural heritage including architectural and archaeological heritage</p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (<i>and coverage of HIA, EqIA and CSIA</i>)
	<p>Improve participation in cultural activities?</p> <p>Promote greater understanding and enhancement of the Borough's historic environment, such as parks and open spaces, and areas with a particular heritage significance?</p> <p>Help foster heritage-led regeneration?</p>	
<p>IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes.</p>	<p>Protect and enhance the landscape and townscape through the appropriate location, layout and design of new development, including the preservation of important open gaps and key views?</p> <p>Protect and enhance the local distinctiveness and contribution to a sense of place?</p> <p>Contribute to London-wide Green Infrastructure objectives, including in respect of the Lee Valley Regional Park?</p>	<p>Landscape</p> <p>Cultural heritage including architectural and archaeological heritage</p>
<p>IIA objective 16: To achieve efficient use of land and materials.</p>	<p>Avoid development of high quality agricultural land?</p> <p>Ensure the re-use and redevelopment of brownfield sites?</p> <p>Make efficient use of recycled and secondary materials?</p> <p>Encourage minimisation, reuse and recycling of waste?</p> <p>Protect mineral resources and ensure development avoids sterilisation of local mineral reserves?</p>	<p>Soil</p> <p>Material assets</p>
<p>IIA objective 17: To manage and reduce the risk of flooding</p>	<p>Minimise the risk of flooding to people, property and infrastructure from rivers?</p> <p>Avoid development in locations at risk from flooding or which could increase the risk of flooding elsewhere, taking into account the impacts of climate change?</p> <p>Create development that incorporates Sustainable Urban Drainage Systems (SUDS) (including their long-term maintenance) to reduce the rate of run-off and the risk of surface water flooding and combined sewer overflows?</p>	<p>Human health</p> <p>Water</p> <p>Climatic factors</p> <p><i>Health Impact Assessment</i></p>

IIA Objective	Appraisal questions- Will the Local Plan...?	Relevant SEA topics covered (<i>and coverage of HIA, EqIA and CSIA</i>)
IIA objective 18: Minimise water use and protect water quality.	Ensure that development does not lead to the deterioration of groundwater, surface water or river water quality? Locate development where adequate foul drainage, sewage treatment facilities, adequate potable water supply and surface water drainage can be made available? Require the incorporation of SUDS? Increase water efficiency, particularly in new developments through innovative design measures?	Water

Chapter 4

IIA findings for Chapter 2 of the Enfield Local Plan

2. Good growth in Enfield

4.1 This chapter presents the IIA findings for the vision, strategic objectives and strategic policies (SP SS1 and SP SS2) included in Chapter 2 (Good growth in Enfield) of the Enfield Local Plan.

Enfield's vision and strategic objectives

4.2 The vision is as follows:

By 2039 Enfield will be a place of growing opportunity for future generations: a green lung of London and a place where new homes and jobs help all our communities thrive. Housing growth will be accommodated across the Borough, ensuring delivery of a mix of housing types and tenures that meet the needs of existing and new residents.

Employment floorspace will be delivered in town centres, existing employment areas and new locations in the north and east of the Borough, building upon the Borough's existing economic strengths and supporting the growth of new economic sectors.

East-west disparities will be reduced by delivering high quality new infrastructure, an uplift in employment floorspace and environmental improvements. Across the Borough, we will use biophilic design principles to ensure that opportunities are maximised to knit new development into improved blue-green networks.

We will be:

A nurturing place – A place that provides people with the ingredients for good life. By accommodating growth throughout the Borough, we will ensure the delivery of high quality and affordable homes supported by jobs, community facilities and excellent education, leisure and cultural opportunities. Growth will be used to address spatial disparities and create opportunities to deliver better outcomes for all.

A deeply green place – A place where enhanced green open spaces and waterways permeate through the urban fabric from the wild places in the rural north, providing access for all to nature on their doorstep. Improved biodiversity, greener urban environments and better air and water quality will deliver places where residents lives enriched with nature. We will successfully respond to the climate crisis through effective mitigation and adaptation, delivering sustainable buildings and transport options, and effectively managed flood risk. We will be a Borough that is carbon neutral.

The workshop of London – A place where new spaces for logistics and manufacturing will support job growth, capitalising on Enfield's strategic position in the UK Innovation Corridor. New employment floorspace will be delivered in town centres and existing and new industrial locations, where improved links to the Borough's green networks will create attractive places for business growth. A range of workspaces will be delivered to meet the needs of a diverse economy, including spaces for homeworking, start-ups, SMEs, and the creative and maker economy. Enfield's hot house of creativity will be harnessed to enrich our industrial heartlands and diversify our town centres.

A distinct and leading part of London – A place of safe growing neighbourhoods whose valuable character, heritage and natural environments are celebrated, managing new development to sustain beautiful places. By ensuring that growth is supported by infrastructure and improved blue and green networks, new developments will enhance both town and country. We will be a place that leads London in access to nature, intergenerational communities, and quality of life.

4.3 The vision is supported by twenty strategic objectives under the four themes in the vision:

A nurturing place

1. To address unequal access to jobs and opportunities by protecting employment floorspace and promoting the development of new workspaces. To tackle spatial disparities by building more quality homes, delivering an uplift in infrastructure to support growth being planned for – including social infrastructure and improving environments in the east.
2. To reduce health inequalities by requiring Health Impact Assessments as part of significant development proposals. To use good design to create walkable connected communities, supporting active and socially connected lives, helping to deliver on the priorities of the Enfield Joint Health and Wellbeing Strategy.
3. To increase the supply of housing to ensure that more people can access good quality homes. To protect family housing and support the delivery of new family homes to help ensure that people who grew up in the borough will have the opportunity to remain.
4. To provide a variety of housing options to meet the needs of everyone, regardless of income, age and ability. To maximise the supply of affordable housing, by resisting the loss of affordable homes and securing 50% of all new homes as genuinely affordable. To deliver wheelchair accessible and supported housing, and support developments that seek to meet the needs of specific communities, including older people, disabled and vulnerable people, students, and Gypsies and Travellers.
5. To ensure the delivery of a joined-up, liveable and inclusive public realm network by requiring development to improve its connectivity, legibility, permeability, accessibility and visual appearance. To make walking and cycling the natural choice by embedding the healthy streets approach into new developments.
6. To deliver active travel routes to make it easy to get around safely and sustainably, and support improvements to the public transport network (including safeguarding land for Crossrail 2). To strengthen east-west links through new routes and access improvements.

Deeply green place

7. To maximise opportunities to experience greenery and the natural world by delivering tree lined streets and improved biodiversity and exceeding urban greening factor targets set out in the London Plan. To use biophilic design principles to link up urban Enfield (including Edmonton, Ponders End, Southbury, Brimsdown and Southgate) to wider natural networks across the Borough.
8. To tackle the climate emergency head-on by ensuring that all major development is zero carbon, evidenced through detailed energy assessments. To support renewable and low-carbon energy generation, including through connection to decentralised energy networks.
9. To support the objectives of the North London Waste Plan by managing waste further up the waste hierarchy. To safeguard air and water quality and manage sources of noise and pollution in line with the agent of change principle.
10. To mitigate the effects of global heating and a changing climate by requiring developments to effectively manage heat risk, incorporate sustainable drainage, and support measures to sustainably manage flood risk, including through optimisation of the blue-green network.
11. To protect and enhance the River Lee and Turkey Brook, Salmons Brook and Pymmes Brook through de-culverting, naturalisation, restoration and the creation of new wetlands. To protect the Green Belt and Metropolitan Open Land and local open spaces and encourage improvements to quality and accessibility to meet the needs of a growing population.
12. To deliver green infrastructure improvements, including accessible new woodland, rewilded river corridors and new parks and open spaces to support growth. To facilitate the creation of a major green infrastructure corridor in the north of the Borough, supporting Enfield's role as a gateway to London as a National Park City.

The workshop of London

13. To deliver an uplift in employment floorspace to meet the needs of businesses. To capitalise on rising demand for logistics and manufacturing by focusing growth in Strategic Industrial Locations and Locally Significant Industrial Sites and the provision of new sites in appropriate locations.

14. To celebrate and make the most of our industrial heartlands, protecting floorspace capacity in employment areas and encouraging industrial intensification. To ensure new development maximises the blue-green connectivity of employment areas, contributing to positive placemaking to attract businesses and investment.
15. To support new office development in Enfield Town, the district centres and Meridian Water. To encourage the delivery of workspaces of a range of sizes and configurations to provide the spaces that small to medium enterprises need to thrive, including flexible and affordable workspaces, and co-working options close to residential communities.
16. To diversify town centres, enabling them to serve as growing and vibrant hubs with quality public spaces providing an attractive setting for civic activities, shopping, leisure, culture and social interaction, supplemented by local centres and parades which provide amenities and services within easy reach of where people live.

A distinct and leading part of London

17. To strengthen the rural parts of Enfield as a leading destination in the London National Park City – a place for people to come and experience nature, with opportunities to walk and cycle through connected habitats of rewilded corridors and experience the highlights of historic and leisure attractions. To support the varied qualities of the rural parts of Enfield, including food growing, nature recovery, thriving economic contributor and landscape value.
18. To protect existing community facilities and ensure that new homes are supported by high quality infrastructure, including education, health, sports, cultural facilities and digital infrastructure, creating safe green attractive neighbourhoods with a good quality of life. To work with partners to ensure essential facilities will be within easy reach of where people live, and can be properly funded through planning contributions, alongside wider sources of infrastructure funding.
19. To focus growth and investment to the Borough's major and district centres (Enfield Town, Angel Edmonton, Edmonton Green, Palmers Green, Southgate) to support the delivery of new homes, jobs, leisure and cultural facilities. To work with partners to deliver a cultural renaissance in Enfield.
20. To draw on the valuable character and heritage of Enfield's communities in managing growth. To use place-based policies to put local distinctiveness at the heart of placemaking and manage proposals for tall buildings to ensure that new development can be sensitively accommodated. To ensure that designated heritage assets and views (strategic and local) are protected and enhanced.

4.4 Table 4.1 below summarises the sustainability effects for the above vision and strategic objectives in relation to the IIA objectives, and the findings are described below the table.

Figure 4.1: IIA findings for vision and strategic objectives

IIA objective	Vision	Strategic objective 1	Strategic objective 2	Strategic objective 3	Strategic objective 4	Strategic objective 5	Strategic objective 6	Strategic objective 7	Strategic objective 8	Strategic objective 9	Strategic objective 10	Strategic objective 11	Strategic objective 12	Strategic objective 13	Strategic objective 14	Strategic objective 15	Strategic objective 16	Strategic objective 17	Strategic objective 18	Strategic objective 19	Strategic objective 20	
IIA1: Climate change mitigation	+?	0	0	0	0	+	+	0	++	0	+	0	0	++	-?	+	0	0	0	0	0	
IIA2: Climate change adaptation	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	
IIA3: Housing	+?	++	0	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
IIA4: Health and wellbeing	+?	0	++	0	0	+	0	++	0	0	0	++	++	0	+	0	0	+	+	0	0	
IIA5: Services and facilities	+?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+	+	0	
IIA6: Social inclusion	+?	+	+	0	0	++	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	
IIA7: Crime and community safety	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
IIA8: Road safety	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
IIA9: Economy	+?	+	0	0	0	0	0	0	0	0	0	0	0	0	++	++	+	+	0	+	0	
IIA10: Town and local centres	+?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	0	0	++	0	
IIA11: Air pollution	+?	0	0	0	0	+	+	0	0	+	0	0	0	0	-?	+	0	0	0	0	0	
IIA12: Sustainable transport	+?	0	0	0	0	+	++	0	0	0	0	0	0	0	0	+	0	0	0	0	0	

IIA objective	Vision	Strategic objective 1	Strategic objective 2	Strategic objective 3	Strategic objective 4	Strategic objective 5	Strategic objective 6	Strategic objective 7	Strategic objective 8	Strategic objective 9	Strategic objective 10	Strategic objective 11	Strategic objective 12	Strategic objective 13	Strategic objective 14	Strategic objective 15	Strategic objective 16	Strategic objective 17	Strategic objective 18	Strategic objective 19	Strategic objective 20
IIA13: Biodiversity	+?	0	0	0	0	0	0	++	0	0	+	++	++	0	0	0	0	+	0	0	0
IIA14: Historic environment	+?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+
IIA15: Landscape and townscape	+?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+
IIA16: Efficient use of land and materials	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IIA17: Flooding	+?	0	0	0	0	0	0	0	0	0	++	+	0	0	0	0	0	0	0	0	0
IIA18: Water	+?	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0

IIA of the vision

4.5 The vision for Enfield sets out a general ambition for development to take place in a sustainable way, embracing a mix of social, economic and environmental aspirations. This will enable the Borough to be an attractive place to live, work and invest. The vision also reflects the Climate Emergency declared by Enfield Council in July 2020, with reference to their ambition to become carbon neutral.

4.6 If the vision is achieved, it can be expected to lead to minor positive effects in relation to the following IIA objectives:

- **IIA1: Climate change mitigation**, because Enfield Council seeks to become a carbon neutral Borough and successfully respond to the climate crisis through effective mitigation and adaptation and delivering sustainable buildings and transport options. The vision also promotes the provision of green open space and improved blue-green networks, which would aid carbon absorption processes and reduce overall emissions within the Borough.
- **IIA3: Housing**, because the vision seeks to accommodate housing growth across the Borough and ensure the delivery of a mix of housing types and tenures, including affordable homes, to meet the needs of existing and new residents.
- **IIA4: Health and wellbeing**, because if other aspects of the vision are achieved, such as the delivery of affordable homes and services, which includes primary healthcare facilities, job opportunities and access to nature, this will provide the foundations for people's health and wellbeing to improve. The vision also seeks to reduce east-west disparities in the Borough through the provision of new infrastructure, which may include healthcare facilities.
- **IIA5: Services and facilities**, because the provision of education, community facilities, leisure and cultural opportunities and other services is specifically referenced in the vision. The vision also seeks to address east-west disparities in the Borough through the provision of new infrastructure, which may include transport services.
- **IIA6: Social inclusion**, because the vision seeks to make Enfield a more equal place where growth delivers better outcomes for all.
- **IIA9: Economy**, because the vision embraces growth which provides for a diverse range of economic opportunity, including the delivery of new employment floorspace in town centres and existing and new industrial locations. The vision makes reference to the potential for the Borough to support job growth in logistics and manufacturing, as well as capitalising on Enfield's strategic position in the UK Innovation Corridor.
- **IIA10: Town and local centres**, because the vision seeks to deliver new employment in the Borough's town centres and industrial locations, which are often located in proximity to urban centres.
- **IIA11: Air pollution**, because the vision seeks to improve air quality in the Borough in order to deliver places where residents and lives are enriched.
- **IIA12: Sustainable transport**, because the vision seeks to successfully respond to the climate crisis through the delivery of sustainable transport options.
- **IIA13: Biodiversity**, because the vision seeks to make Enfield a deeply green place and improve biodiversity and blue-green networks, describing the Borough as a green lung of London. The vision also seeks to address east-west disparities in the Borough through environmental improvements.
- **IIA14: Historic environment**, because the vision encourages growth but seeks to enhance and celebrate the Borough's heritage.
- **IIA15: Landscape and townscape**, because the vision encourages growth but seeks to enhance and celebrate the Borough's character and will ensure that new developments enhance both town and country.
- **IIA17: Flooding**, because the vision aims to successfully respond to the climate crisis through the effective management of flood risk in the Borough.
- **IIA18: Water**, because the vision seeks to improve water quality in the Borough to deliver places where residents lives are enriched with nature.

4.7 The vision is unlikely to have any adverse effects in relation to the IIA objectives. Due to the fact they are not specifically mentioned or indirectly affected, the vision's contribution to the achievement of the following objectives is likely to be negligible:

IIA2: Climate change adaptation, IIA7: Crime and community safety, IIA8: Road safety and IIA16: Efficient use of land and materials.

4.8 All of the effects of the vision are subject to some uncertainty since their achievement will depend on the details of the Local Plan policies and site allocations which are designed to implement it (and have been appraised separately in **Chapters 5 and 6** in this IIA Report).

IIA of the strategic objectives

A nurturing place

4.9 Strategic objective 5 is to encourage walking and cycling by embedding the health streets approach into new development. As such, minor positive effects are expected against **IIA1: Climate change mitigation, IIA11: Air pollution and IIA12: Sustainable transport**. As this will encourage more active and healthy lifestyles, a minor positive effect is also expected against **IIA4: Health and wellbeing**.

4.10 Strategic objective 6 seeks to deliver active travel routes that will enable safe and sustainable travel, as well as support improvements to the public transport network and strengthen east-west links through new routes and access improvements. As such, minor positive effects are expected against **IIA1: Climate change mitigation and IIA11: Air pollution**, while a significant positive effect is expected against **IIA12: Sustainable transport**.

4.11 Strategic objectives 1, 3 and 4 seek to increase the supply of a variety of housing, including family housing and to maximise the supply of affordable housing, improve access to good quality homes and address east-west spatial disparities. As such, significant positive effects are expected in relation to **IIA3: Housing**.

4.12 Strategic objective 2 seeks to reduce health inequalities in the Borough and create walkable connected communities to encourage active and social lifestyles, helping to deliver on the priorities of the Enfield Joint Health and Wellbeing Strategy. Therefore, a significant positive effect is expected against **IIA4: Health and wellbeing** and a minor positive effect is expected against **IIA6: Social inclusion**.

4.13 Strategic objective 5 is to ensure the delivery of an inclusive public realm network that is connected, legible, permeable, accessible and visually attractive. Therefore, a significant positive effect is expected in against **IIA6: Social inclusion**.

4.14 In addition, Strategic objective 1 seeks to address east-west spatial disparities by delivering an uplift in infrastructure, including social infrastructure and improving environments in the east. Strategic objective 4 aims to provide a variety of housing options to support the needs of specific communities in the Borough, including older people, disabled and vulnerable people, students and Gypsies and Travellers. As such, minor positive effects are expected in relation to **IIA6: Social inclusion**.

4.15 Strategic objective 1 seeks to improve access to jobs and employment opportunities, resulting in a minor positive effect in relation to **IIA9: Economy**.

Deeply green place

4.16 Strategic objective 8 sets out the Council's approach to addressing the climate emergency through the delivery of zero carbon development and renewable and low-carbon energy generation, while Strategic objective 10 aims to mitigate the effects of climate change through several measures including the effective management of heat risk. Therefore, a significant positive effect is expected against **IIA1: Climate change mitigation** in relation to Strategic objective 8, while a minor positive effect is expected in relation to Strategic objective 10.

4.17 Strategic objective 7 is to maximise opportunities for urban greening and exceed urban greening factor targets set out in the London Plan. It seeks to link up urban Enfield to wider natural networks across the Borough, improving biodiversity and access to nature, while Strategic objective 12 is to deliver green infrastructure improvements and facilitate the creation of a major green infrastructure corridor in the north of the Borough in order to support Enfield's role as a gateway to London as a National Park City. Therefore, these objectives are likely to have significant positive effects in relation to **IIA4: Health and wellbeing and IIA13: Biodiversity**. In addition, Strategic objective 11 seeks to protect and improve quality and access to the Green Belt, Metropolitan Open Land and local open spaces, and will also aim to protect and enhance the River Lee and Turkey Brook, Salmons Brook and Pymmes Brook through naturalisation, restoration and the creation of new wetlands. As such, significant positive effects are expected in relation to **IIA4: Health and wellbeing and IIA13: Biodiversity**.

4.18 Strategic objective 9 seeks to support the objectives of the North London Waste Plan and manage waste in order to safeguard air and water quality, as well as manage sources of noise and pollution. It is therefore likely to protect environmental health and the amenity of the Borough's residents, resulting in minor positive effects against **IIA4: Health and wellbeing**, **IIA11: Air pollution** and **IIA18: Water**.

4.19 Strategic objective 10 seeks to mitigate the effects of global heating and a changing climate by requiring developments to effectively manage heat risk. Therefore, a significant positive effect is expected in relation to **IIA2: Climate change adaptation**. Strategic objective 10 also aims to mitigate the effects of climate change through the optimisation of the blue-green network, which is likely to benefit biodiversity in the Borough. Therefore, a minor positive effect is expected against **IIA13: Biodiversity**. Strategic objective 10 will also encourage the incorporation of sustainable drainage in development as well as measures to sustainably manage flood risk including through optimisation of the blue-green network. As such, a significant positive effect is expected against **IIA17: Flooding** while a minor positive effect is expected against **IIA18: Water**.

4.20 Strategic objective 11 seeks to protect and enhance waterways in the Borough including through the creation of new wetlands, which has potential to contribute to sustainably managed flood risk. Therefore, a minor positive effect is expected against **IIA17: Flooding**.

The workshop of London

4.21 Strategic objective 15 will support the delivery of a variety of workspaces including co-working options close to residential communities. This will limit the need to travel and is likely to contribute to a reduction in the use of private vehicles and therefore carbon emissions, resulting in a minor positive effect against **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport**. Strategic objective 14 seeks to ensure that new development maximises blue-green connectivity of employment areas, which is likely to result in physical and mental health benefits. Therefore, a minor positive effect is expected against **IIA4: Health and wellbeing**.

4.22 Strategic objective 16 seeks to diversify town centres in the Borough and improve them as attractive public spaces for civic activities, retail, leisure, culture and social interaction. It also seeks to ensure that local centres provide amenities and services in proximity to where people live, resulting in minor positive effects against **IIA5: Services and facilities**, **IIA6: Social inclusion**, and **IIA9: Economy** and a significant positive effect against **IIA10: Town and local centres**.

4.23 Strategic objective 13 is to deliver an uplift in employment floorspace and focus economic growth in Strategic Industrial Locations and Locally Significant Industrial Sites, as well as the provision of new sites, while Strategic objective 14 seeks to protect floorspace in employment areas and encourage industrial intensification, as well as contribute to positive placemaking in order to attract businesses and investment. Therefore, significant positive effects are expected against **IIA9: Economy** in relation to these Strategic objectives. However, industrial intensification may lead to an increase in carbon emissions due to industrial activity and an influx of workers from outside of the Borough that use private vehicles to commute. As such, an uncertain minor negative effect is expected against **IIA1: Climate change mitigation** and **IIA11: Air pollution** in relation to Strategic objective 14.

4.24 In addition, Strategic objective 15 will support new office development in Enfield Town, the district centres and Meridian Water, as well as the delivery of a variety of workspaces including flexible and affordable workspaces. Therefore, a significant positive effect is expected for **IIA9: Economy** in relation to this objective, while a minor positive effect is expected for **IIA10: Town and local centres**.

A distinct and leading part of London

4.25 Strategic objective 18 will ensure that new homes are supported by high quality infrastructure, including education, health, sports cultural facilities and digital infrastructure and that essential facilities are within easy reach of where people live. As such, minor positive effects are expected against **IIA4: Health and wellbeing** and **IIA5: Services and facilities** in relation to Strategic objective 18.

4.26 Strategic objective 19 is to ensure that growth and investment is focused on the Borough's major and district centres in order to support the delivery of new homes, jobs, leisure and cultural facilities, resulting in minor positive effects against **IIA3: Housing**, **IIA5: Services and facilities**, **IIA6: Social inclusion**, and **IIA9: Economy**, and a significant positive effect against **IIA10: Town and local centres**.

4.27 Strategic objective 17 seeks to encourage opportunities to walk and cycle through connected habitats of rewilded corridors, historic and leisure attractions resulting in minor positive effects against **IIA4: Health and wellbeing** and **IIA14: Historic environment**. Strategic objective 17 is also to strengthen the rural parts of Enfield and support its varied qualities, including food growing, nature recovery, landscape value and its economic contribution, in order to support the Borough’s role in the London National Park City. Therefore, minor positive effects are expected against **IIA9: Economy**, **IIA13: Biodiversity** and **IIA15: Landscape and townscape**.

4.28 Strategic objective 20 seeks to encourage local distinctiveness in placemaking and ensure that new development is sensitively accommodated, as well as protect and enhance designated heritage assets and views. Therefore, minor positive effects are expected against **IIA14: Historic environment** and **IIA15: Landscape and townscape**.

4.29 Like the vision, due to the fact they are not specifically mentioned or indirectly affected, the Strategic objectives have no effect on the following IIA objectives: **IIA2: Climate change adaptation**, **IIA7: Crime and community safety**, **IIA8: Road safety** and **IIA16: Efficient use of land and materials**.

Recommendations

- The vision and/or strategic objectives could make more explicit reference to measures to improve community and road safety, improving the Borough’s resilience to climate change through adaptation measures and also the overall aim to use land and materials efficiently. However, it is recognised that more detailed policies within the Enfield Local Plan do directly or indirectly address these IIA objectives, such as Policy DM SE7: Climate change adaption and managing heat risk and DM SE8: Managing flood risk for IIA2; Policies DM DE6: Tall buildings and DM DE7: Creating liveable, inclusive and quality public realm for IIA7; SP T1: Promoting sustainable transport and DM T2: Making active travel attractive and the natural choice for IIA8; and Policies SS1: Spatial Strategy, DM H4: Small sites and small housing development, DM SE3: Whole-life carbon and circular economy and a number of the policies in the Town Centres and High Streets section for IIA16.

Strategic Policies SS1 and SS2

4.30 The likely sustainability effects of the good growth in Enfield policies (Strategic Policies SP SS1: Spatial Strategy and SP SS2: Making good places) are set out in **Table 4.2** and described below the table.

Table 4.1: IIA findings for the good growth in Enfield policies

IIA objective	SP SS1: Spatial strategy	SP SS2: Making good places
IIA1: Climate change mitigation	++/--	++/-
IIA2: Climate change adaptation	0	0
IIA3: Housing	++	0
IIA4: Health and wellbeing	+	+
IIA5: Services and facilities	++	+
IIA6: Social inclusion	+	+
IIA7: Crime and community safety	0	0

IIA objective	SP SS1: Spatial strategy	SP SS2: Making good places
IIA8: Road safety	0	0
IIA9: Economy	++	+
IIA10: Town and local centres	++	+
IIA11: Air pollution	++/--	++/-
IIA12: Sustainable transport	++/--	++/-
IIA13: Biodiversity	+/-	+
IIA14: Historic environment	-?	+
IIA15: Landscape and townscape	+/-?	+
IIA16: Efficient use of land and materials	++/-	+
IIA17: Flooding	-?	0
IIA18: Water	+	0

4.31 Policy SP SS1: Spatial strategy is expected to have mixed significant positive and significant negative effects in relation to **IIA12: Sustainable transport, IIA11: Air pollution** and **IIA1: Climate change mitigation**. The significant positive effect is because the policy supports growth at transport nodes and encourages sustainable travel choices, as well as opportunities for sustainable and active travel, green links to facilitate movement and providing a place for living and working within a local neighbourhood. However, the amount of development proposed by the policy is likely to result in an increase in cars on the road as a result of population increase and some of the new place-making areas not being close to existing sustainable transport, e.g. Chase Park. An increase in cars on the road is likely to result in an increase in CO₂ emissions and air pollution with significant negative effects on these IIA objectives, until diesel and petrol usage decreases and electric vehicle usage increases. Further to this, the policy supports the development of a new logistics hub close to Junction 24 of the M25, which supports road transport of goods and may not be as easily accessible for employees via more sustainable and active modes of transport (i.e. walking and cycling). Policy SP SS2: Making good places is expected to have mixed significant positive and minor negative effects in relation to these three objectives because it requires development proposals to contribute towards the provision of transport infrastructure, which may include walking and cycling, but may also include the road network and therefore increase reliance on the private car. However, the policy does support development proposals which contribute towards the blue and green infrastructure network which is likely to comprise walking and cycling routes.

4.32 Policy SP SS1: Spatial strategy is expected to have a significant positive effect in relation to **IIA3: Housing** because it supports the development of at least 25,000 new homes across a range of different areas, which will contribute significantly to the Borough's housing need and should help to provide a mix of different housing types and affordable homes. Both policies are expected to have a minor positive effect in relation to **IIA4: Health and wellbeing** because they support the creation of healthy places. Policy SP SS1 supports improvements to local infrastructure and services, which is likely to include healthcare, in addition to improvements to green and blue spaces and access to them, whilst Policy SP SS2 promotes active and healthy lifestyles, as well as the provision of blue and green infrastructure. The policies also both support a mix of development uses, which is likely to include healthcare. In particular, Policy SP SS1 sets out that Enfield Town, Meridian Water, Edmonton, Southbury, Southgate, New Southgate and Angel Edmonton will be major urban foci of high quality growth, accommodating a

range of uses. Therefore, Policy SP SS1 is expected to have a significant positive effect in relation to **IIA5: Services and facilities**, whilst Policy SP SS2 is expected to have a minor positive effect in relation to this objective.

4.33 Policies SP SS1: Spatial strategy and SP SS2: Making good places are expected to have minor positive effects in relation to **IIA6: Social inclusion**. This is because Policy SP SS1 supports the development of a significant number of new homes, which will include a proportion of affordable homes, whilst Policy SP SS2 seeks to make all development within LBE inclusive and accessible, with beneficial effects on social cohesion. Both policies also support sustainable travel choices and will therefore help ensure that residents who may not have access to a car, can still travel around the Borough easily.

4.34 Policy SP SS1: Spatial strategy is expected to have a significant positive effect in relation to **IIA9: Economy** and **IIA10: Town and local centres** because it supports the development of a mix of employment, retail, leisure, housing, community and cultural uses at Enfield Town, Meridian Water, Edmonton, Southbury, Southgate, New Southgate and Angel Edmonton, which will contribute significantly towards the local economy at the same time as enhancing the vitality of the centres. According to the policy, employment needs will be met through the intensification of existing industrial areas, a small extension of strategic industrial land, and new sites in urban and rural locations. A new logistics hub will be delivered close to Junction 24 of the M25 and provide a significant amount of the Borough's employment needs in the Plan period. Rural areas will also be managed for a number of sustainable countryside uses, including food production, forestry, eco-tourism, recreation, education, leisure and sporting excellence, with beneficial effects on the rural economy. Policy SP SS2: Making good places is expected to have a minor positive effect in relation to these two objectives because it supports a mix of uses to create vibrant and lively places. It also supports sustainable development that enhances the Borough's character and requires development proposals to promote and support the Borough's rich heritage and cultural assets, contributing to the creation and maintenance of local distinctiveness, all of which will help to draw investment into the Borough and contribute positively to town and local centres.

4.35 A minor positive effect is expected for Policy SP SS1: Spatial strategy in relation to **IIA13: Biodiversity** because it seeks to facilitate nature recovery and improvements to green and blue spaces, in addition to urban greening. According to the policy, Chase Park will provide a deeply green extension to the urban area. However, the large-scale housing and employment growth proposed through the spatial strategy could have minor negative effects on biodiversity, particularly where development is proposed on greenfield land and/or close to nature conservation sites such as in the place-making areas at Chase Park, Crews Hill, New Southgate and Enfield Town. Policy SP SS2: Making good places is also expected to have a minor positive effect in relation to this objective because it requires development proposals to contribute towards the provision of blue and green infrastructure, in addition to enhancing local wildlife and biodiversity. The policy also requires development proposals to actively seek out opportunities for nature recovery. Policy SP SS2 is also expected to have a minor positive effect in relation to **IIA14: Historic environment** because it requires all development to enhance the Borough's character and contribute towards creating a high-quality environment that respects and enhances the heritage context. According to the policy, development proposals must promote and support the Borough's rich heritage and cultural assets, contributing to the creation and maintenance of local distinctiveness. Policy SP SS1: Spatial strategy is likely to have a minor but uncertain negative effect in relation to IIA14: Historic Environment due to the large-scale housing and employment proposed through the spatial strategy, which could adversely affect heritage assets and their settings, particularly where development is proposed within Conservation Areas and/or close to heritage assets such as Listed Buildings, such as in the place-making areas at Enfield Town, Angel Edmonton, New Southgate, Crews Hill and Chase Park. However, it is recognised that many of the Place policies include requirements to design development sensitively and by responding appropriately to the historic environment.

4.36 The two policies are expected to have minor positive effects in relation to **IIA15: Landscape and townscape**. Policy SP SS1: Spatial strategy supports the consolidation of the blue and green infrastructure network and states that Chase Park will draw the rewilding areas of Enfield Chase into the urban area. The policy also states that employment areas will become more sensitively integrated within the wider neighbourhood in which they sit, with tall buildings only permitted in appropriate locations and where they are exemplary in quality. However, Policy SP SS1: Spatial strategy could also have a minor negative but uncertain effect on landscape and townscape due to the large-scale housing and employment proposed through the spatial strategy, particularly where development is proposed on the edge of existing settlements and on greenfield land in the rural areas, such as in the place-making areas at New Southgate, Chase Park and Crews Hill. Policy SP SS2: Making good places requires all development to enhance the Borough's character and contribute to the places in which they are located. According to the policy, all development should be of high quality design and make a positive contribution to creating a high-quality environment that respects and enhances its landscape and townscape. Like Policy SP SS1, it also supports consolidation of the blue and green infrastructure network. Policy SP SS1 is expected to have a significant positive effect in relation to **IIA16: Efficient use of land and materials** because it supports the redevelopment of brownfield land, vacant and underused

buildings, in addition to the use of smaller sites across the urban area. This aspect of the policy is also expected to enhance the townscape through the redevelopment of vacant and underused buildings that currently have poor aesthetic quality. However, due to the large-scale housing and employment proposed through the spatial strategy, particularly where development is proposed on the edge of existing settlements and on greenfield land in the rural areas, Policy SP SS1 could also have a minor negative effect in relation to IIA16. Policy SP SS2 is expected to have a minor positive effect in relation to IIA16 because it states that larger scale developments must make the best use of land.

4.37 Policy SP SS1: Spatial strategy could have a minor negative effect in relation to **IIA17: Flooding** because a small number of sites allocated for residential development partially fall within Flood Zone 3. Finally, Policy SP SS1 is likely to have a minor positive effect in relation to **IIA18: Water** because it supports improvements to blue spaces and is therefore expected to improve the ecological potential of watercourses within the Borough.

4.38 Negligible effects are expected in relation to **IIA2: Climate change adaptation**, **IIA7: Crime and community safety** and **IIA8: Road safety**, due to the fact they are not specifically mentioned or indirectly affected.

Recommendations

- Policy SP SS1: Spatial strategy and Policy SP SS2: Making good places could make more explicit reference to measures to improve community and road safety and improving the Borough's resilience to climate change through adaptation measures.
- With respect to IIA7 and IIA8, Policy SP SS1 could:
 - Support targeted interventions to reduce crime and increase community safety, guided by LBE's Crime and Community Safety team, and ensure high quality new developments that are future proofed.
 - Encourage access to, and the provision of, community and youth facilities in more deprived neighbourhoods.
- Policy SP SS2 could:
 - Seek to reduce levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting, etc.
- However, it is recognised that more detailed policies within the Enfield Local Plan do directly or indirectly address these IIA objectives, such as Policy DM SE7: Climate change adaption and managing heat risk and DM SE8: Managing flood risk for IIA2; Policies DM DE6: Tall buildings and DM DE7: Creating liveable, inclusive and quality public realm for IIA7; SP T1: Promoting sustainable transport and DM T2: Making active travel attractive and the natural choice for IIA8.

Chapter 5

IIA findings for the place policies in Chapter 3 of the Enfield Local Plan

5.1 This chapter presents the IIA findings for the ten Place policies in Chapter 3 of the 2021 Enfield Local Plan:

- Policy SP PL1: Enfield Town
- Policy SP PL2: Southbury
- Policy SP PL3: Edmonton Green
- Policy SP PL4: Angel Edmonton
- Policy SP PL5: Meridian Water
- Policy SP PL6: Southgate
- Policy SP PL7: New Southgate
- Policy SP PL8: Rural Enfield
- Policy SP PL9: Crews Hill
- Policy SP PL10: Chase Park

3. Place

5.2 The IIA findings for each of the ten Place policies are set out below. A summary table illustrating the likely sustainability effects of each policy is provided, using the symbols and colour coding described in **Figure 2.2**. The effects of all ten Place policies alongside each other can be seen in **Table 7.1** at the start of the Cumulative Effects chapter in **Chapter 7**. As noted in **Chapter 2**, negligible effects are recorded where a policy or site allocation is considered to have no effect in contributing to achievement of the IIA objective. For the Place policies, this is usually the case when the policy makes no explicit reference to what the IIA objective is seeking to achieve (e.g. IIA2: Climate change adaptation). However, it is usually the case that another policy or policies within the Local Plan directly seek to address that IIA objective (e.g. in this case Policy DM SE7: Climate change adaptation and managing heat risk).

Enfield Town

Table 5.1: IIA findings for Policy SP PL1: Enfield Town

IIA objective	SP PL1: Enfield Town
IIA1: Climate change mitigation	++/-
IIA2: Climate change adaptation	0
IIA3: Housing	++
IIA4: Health and wellbeing	++
IIA5: Services and facilities	++?
IIA6: Social inclusion	+
IIA7: Crime and community safety	+

IIA objective	SP PL1: Enfield Town
IIA8: Road safety	+
IIA9: Economy	++
IIA10: Town and local centres	++
IIA11: Air pollution	--/+
IIA12: Sustainable transport	++
IIA13: Biodiversity	+/-
IIA14: Historic environment	+?/-?
IIA15: Landscape and townscape	+?
IIA16: Efficient use of land and materials	++
IIA17: Flooding	-?
IIA18: Water	+/-

5.3 Policy SP PL1: Enfield Town supports a range of uses to be developed within Enfield Town and seeks to respond to the area's historic environment, in addition to enhancing the public realm and blue and green infrastructure network. It includes four mixed-use allocations and three housing allocations. Policy SP PL1 is expected to have a mixed significant positive and minor negative effect in relation to **IIA1: Climate change mitigation** because the range of development types supported at Enfield Town is expected to draw more residents and visitors into the area and could therefore increase the number of cars coming into the town and associated CO₂ emissions. However, the policy also seeks to make walking and cycling significantly more accessible and having a mix of uses all in one place means that different services and facilities will be within walking distance of one another. Further to this, the placemaking area contains two railway stations (Enfield Town and Enfield Chase) and a number of bus stops and is therefore likely encourage the use of public transport, which will also help minimise CO₂ emissions associated with the private car.

5.4 A significant positive effect is expected against **IIA3: Housing** in relation to this policy because a large number of new homes will be delivered within the placemaking area, with four of the seven allocations expected to deliver more than 100 housing units each. Significant positive effects are also expected in relation to **IIA4: Health and wellbeing** and **IIA5: Services and facilities** because the policy supports the delivery of a mix of uses, which may include healthcare and education facilities. A number of GP surgeries and open spaces are already located within Enfield Town and the policy seeks to enhance open spaces to create a more attractive environment. The placemaking vision for Enfield Town specifically states that access to nearby green spaces and watercourses will continue to be excellent, with new street improvements and public realm projects drawing these qualities into the heart of the area and improving the attractiveness of active travel to and through the area. A number of primary and secondary schools are also located within and around the town. The significant positive effect on IIA5 is recorded as uncertain because it is unknown whether the schools have capacity for new pupils or not.

5.5 The placemaking area is not located within one of the 20% most deprived areas within England but the policy supports an inclusive environment that is welcoming to all. Additionally, affordable housing will be provided as part of development. Therefore, Policy SP PL1 is expected to have a minor positive effect in relation to **IIA6: Social inclusion**. A minor positive effect is also expected in relation to **IIA7: Crime and community safety** because the policy supports active frontages which is a form of passive surveillance, whilst also requiring a review of safety and lighting of walking and cycle routes so as to support the evening and night time economy. Policy SP PL1 is also expected to have a minor positive effect in relation to **IIA8: Road safety** because it seeks to enhance the public realm and make cycling and walking more accessible and safer.

5.6 Policy SP PL1 is expected to have a significant positive effect against **IIA9: Economy** and **IIA10: Town and local centres** because it supports the regeneration of Enfield Town, which will reinforce its role as the Borough's major centre and principal

civic and cultural hub. The placemaking vision for Enfield Town specifically states that Enfield Town will continue to be the focus of the Borough's civic, entertainment, leisure, commercial and retail activity, but that the centre will have evolved to also include a wider mix of uses, including new homes. Although the placemaking area is not located adjacent or close to Locally Significant Industrial Sites or Strategic Industrial Locations, it supports a mix of uses which will diversify the centre and improve resilience, helping secure its long-term vitality and viability. As set out in the policy, development in Enfield Town must retain or re-provide existing workspace and deliver net increases wherever possible. A broad range of workspace typologies will be supported, with priority given to office floorspace and flexible workspace. Provision of workspace suitable for small businesses will also be strongly encouraged.

5.7 Enfield Town contains and is within close proximity to a number of railway stations and bus stops, which could reduce use of the private car and help minimise associated air pollution. Policy SP PL1 seeks to make walking and cycling more accessible and by having a mix of uses in one area, means that different services and facilities are within walking distance of one another. Mitigation provided under Policies SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice would also help encourage more active and sustainable travel choices. However, the regeneration of Enfield Town may attract more people to the area, which could increase the number of cars on the road with adverse effects on air quality. Indeed, all but one of the allocations scored 2 in the air quality appraisal. The air quality appraisal gave consideration to the estimated housing capacity of each of the allocations and proximity to Air Quality Focus Areas (AQFAs)⁴⁵, in order to determine the potential future impact on the air quality of each site. Therefore, a mixed significant negative and minor positive effect is expected in relation to **IIA11: Air pollution**.

5.8 Despite the potential for increased car use associated with new development, Policy SP PL1 is expected to have a significant positive effect in relation to **IIA12: Sustainable transport** because Enfield Town contains two railway stations and a number of bus stops. Therefore, focusing growth within the centre is likely encourage the use of public transport. Further to this, the policy seeks to make walking and cycling significantly more accessible and safer, in addition to supporting a mix of uses that will ensure there are a range of services within walking distance of one another.

5.9 Enfield Town contains three SINCS and its development could therefore have potential adverse effects on these designations: (1) New River; (2) Enfield Loop of the New River; and (3) Crews Hill to Bowes Park RAILSIDES. Some areas of deciduous woodland, which is a Priority Habitat, are also located within the placemaking area. However, the policy states that development in Enfield Town must facilitate or contribute to clear and coordinated green and blue enhancements. Mitigation will also be achieved through other policies in the Local Plan (e.g. SP BG2: Protecting nature conservation sites). Therefore, overall, Policy SP PL1 is expected to have a mixed minor positive and minor negative effect in relation to **IIA13: Biodiversity**.

5.10 A mixed minor positive and minor negative effect is expected in relation to **IIA14: Historic environment** because the whole of Enfield Town is a Conservation Area that contains a large number of listed buildings. Archaeological Priority Areas are also located within the placemaking area (APA6: Enfield Town Centre and APA7: Ermine Street). Therefore, development could have an adverse effect on the historic environment. However, Policy SP PL1 states that development in Enfield Town must demonstrate how it has responded appropriately to the historic environment, which includes the market square, area around Gentleman's Row and the Parish Church. Further to this, Appendix B in the Local Plan requires a Heritage Impact Assessment to be undertaken for all allocations within the placemaking area and mitigation provided. The mixed effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development.

5.11 A minor positive effect is expected in relation to **IIA15: Landscape and townscape** because this policy supports development of previously developed land within Enfield Town and is therefore expected to enhance the townscape and avoid impacts on landscape elsewhere in the Borough. However, the effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. Support for use of previously developed land will have a significant positive effect in relation to **IIA16: Efficient use of land and materials**. Enhancements to the townscape will also be achieved through improvements to the public realm, nearby open spaces and watercourses, and the creation of active frontages. The policy states that development must reduce the prominence of servicing and inactive frontages.

5.12 Although none of the allocated sites within this placemaking area fall within Flood Zones 2 or 3, most of them are at risk of surface water flooding with a predicted peak flood depth of greater than 300mm. However, flood risk mitigation will be provided through Local Plan Policy DM SE8: Managing flood risk. Therefore, Policy SP PL1 is expected to have a minor negative effect in relation to **IIA17: Flooding**. Enfield Town falls within Source Protection Zones 1 and 2 and the Enfield Loop of New River runs

⁴⁵ An AQFA is a location that has been identified as having high levels of pollution and human exposure.

through the area. Therefore, development under this policy could potentially cause a deterioration in water quality (e.g. through sediment runoff during construction and/or increased pressure on wastewater treatment) but due to the fact the area is already developed, the potential for contamination is reduced. Policy SP PL1 states that all development must contribute towards enhancing watercourses. Therefore, overall, a mixed minor positive and minor negative effect is expected in relation to **IIA18: Water**.

5.13 Negligible effects are expected in relation to IIA2: Climate change adaptation.

Southbury

Table 5.2: IIA findings for Policy SP PL2: Southbury

IIA objective	SP PL2: Southbury
IIA1: Climate change mitigation	++/-
IIA2: Climate change adaptation	0
IIA3: Housing	++
IIA4: Health and wellbeing	++
IIA5: Services and facilities	++?
IIA6: Social inclusion	+
IIA7: Crime and community safety	+
IIA8: Road safety	+
IIA9: Economy	++
IIA10: Town and local centres	++
IIA11: Air pollution	--/+
IIA12: Sustainable transport	++
IIA13: Biodiversity	+
IIA14: Historic environment	0?
IIA15: Landscape and townscape	++?
IIA16: Efficient use of land and materials	++
IIA17: Flooding	-?
IIA18: Water	-

5.14 Policy SP PL2: Southbury supports new residential-led mixed-use development within Southbury and the potential creation of a new local centre, in addition to improvements to the public realm and townscape. It includes five mixed-use allocations and one industrial allocation. Policy SP PL2 is expected to have a mixed significant positive and minor negative effect in relation to **IIA1: Climate change mitigation** because the residential-led mixed-use development is expected to attract more residents and workers into the area and could therefore increase the number of car journeys into Southbury and associated CO₂ emissions, particularly due to the proximity of the A10. However, the policy seeks to promote active travel and improve the pedestrian environment along the A10 through the provision of a green buffer, in addition to facilitating the delivery of a new cycle lane in both directions along the A10. This placemaking area includes one railway station (Southbury) and a number of bus stops, in

addition to falling within 1km of other railway stations, and may therefore encourage the use of public transport, which will also help minimise CO₂ emissions associated with the private car. The policy also lists specific priorities, which includes enhancing the visual presence of the railway station within the wider area.

5.15 The policy is expected to have a significant positive effect in relation to **IIA3: Housing** because a large number of new homes will be delivered within the placemaking area, with all five of the mixed-use allocations expected to deliver more than 100 housing units each. Significant positive effects are also expected in relation to **IIA4: Health and wellbeing** because the policy supports the delivery of a mix of uses, which may include healthcare facilities. Although this placemaking area does not contain any GP surgeries, there are a number within 400m. Areas of open space are also present within the placemaking area and the policy seeks to deliver or contribute towards new pocket parks and improved accessibility and enhancements to existing open spaces. There is also a requirement for development proposals within Southbury to demonstrate how they will improve the pedestrian environment along the A10, in addition to the delivery of a new cycle lane in both directions along the A10 – both of which will help promote walking and cycling and increase overall levels of physical exercise. With respect to amenity, the policy states that blocks must be oriented to minimise the negative noise and air quality impacts of the A10, with single aspect homes or balconies facing the A10 being resisted. Policy SP PL2 is also expected to have a significant positive effect in relation to **IIA5: Services and facilities** because the policy supports a mix of uses, which includes community facilities and potentially education. The placemaking area contains a secondary school and is also located within 800m of a number of primary schools and one other secondary school. The significant positive effect is recorded as uncertain because it is unknown whether the existing schools have capacity for new pupils or not.

5.16 The placemaking area is partially located within one of the 20% most deprived areas within England and is therefore expected to help regenerate the area through a range of development types, with beneficial effects on social inclusion. Provision will also be made for affordable housing, in addition to improvements to the pedestrian environment and new cycle lanes along the A10, making the area more accessible to those who may not have a car. As such, a minor positive effect is expected in relation to **IIA6: Social inclusion**. A minor positive effect is also expected in relation to **IIA7: Crime and community safety** because the policy seeks to ensure that active frontages are located along key routes through and around proposed development sites, which is a form of passive surveillance. The policy lists specific priorities, which includes improving the safety and security of the station environment. A minor positive effect is also expected in relation to **IIA8: Road safety** because the policy supports the installation of new crossing points, which will make crossing roads safer for pedestrians.

5.17 A significant positive effect is expected in relation to **IIA9: Economy** because the policy includes an industrial allocation that will provide approximately 4,530sqm of employment land. The placemaking area is also located adjacent to Strategic Industrial Locations and Locally Significant Industrial Sites, and therefore new residents will be within close proximity to job opportunities. With regard to **IIA10: Town and local centres**, Policy SP PL2 will lead to an appropriate phased release of a retail park, which may have been drawing business away from town centres. The placemaking vision for Southbury states that Southbury will act as a key gateway into the Lee Valley, Ponders End and Enfield Town and according to the policy, a new local centre may potentially be created. Therefore, a significant positive effect is expected in relation to IIA10.

5.18 Southbury contains and is within close proximity to railway stations and bus stops, which would facilitate higher levels of sustainable transport use and help minimise associated air pollution. The policy seeks to promote active travel and improve the pedestrian environment along the A10 through the provision of a green buffer, in addition to facilitating the delivery of a new cycle lane in both directions along the A10. Providing a mix of uses within one area is also likely to encourage more active travel choices as different services will be within walking distance of one another. Mitigation provided under Policy SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice would also help encourage more active and sustainable travel choices. However, the residential-led mixed-use development scheme may attract more people to the area, which could increase the number of cars on the road with adverse effects on air quality. All but one of the sites allocated in the policy scored 2 in the air quality appraisal. The air quality appraisal gave consideration to the estimated housing capacity of the mixed-use sites and the area of the industrial site option and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. Therefore, a mixed significant negative and minor positive effect is expected in relation to **IIA11: Air pollution**.

5.19 Despite the potential for increased car use associated with new development, Policy SP PL2 is expected to have a significant positive effect in relation to **IIA12: Sustainable transport** because Southbury contains a railway station and a number of bus stops, in addition to being within close proximity to other railway stations. Therefore, focusing growth within the area is likely to encourage and facilitate the use of public transport. Indeed, the policy seeks to enhance the visual presence of

the station within the wider area. The policy also seeks to promote walking and cycling through enhancements to the pedestrian environment and new cycle routes along the A10.

5.20 The Southbury placemaking area does not contain designated biodiversity assets but is within 250m of a Priority Habitat (deciduous woodland). However, mitigation is provided in the form of Policy SP BG2: Protecting nature conservation sites in the Local Plan. The Southbury placemaking policy requires the provision of a green buffer along the A10, in addition to delivering or contributing towards pocket parks, both of which could potentially contribute towards biodiversity. Therefore, overall, Policy SP PL2 is expected to have a minor positive effect in relation to **IIA13: Biodiversity**.

5.21 The Southbury placemaking area contains one Grade II listed building (Ripaults Factory) and is within 500m of another Grade II listed building (Queen Elizabeth Stadium). Archaeological Priority Areas are also located within the placemaking area (APA7: Ermine Street and APA10: Southbury Road). Development is unlikely to have an adverse effect on the setting of the historic environment because the placemaking area already contains built development and mitigation is provided by Policy SP DE4: Putting heritage at the centre of placemaking. Further to this, Appendix B in the Local Plan requires a Heritage Impact Assessment to be undertaken for all allocations within the placemaking area and mitigation provided. Therefore, a negligible effect is likely in relation to **IIA14: Historic environment**. The effect is recorded as uncertain because the site could still have some potential for impacts on non-designated heritage features and the actual effect will depend on the final design, scale and layout of development which is not yet known.

5.22 Policy SP PL2 is expected to have a significant positive effect in relation to **IIA15: Landscape and townscape** because the policy supports a coherently planned and appropriate distribution of scale and massing of built form, the creation of urban blocks that integrate well with the surrounding residential areas and tall buildings that aid legibility and also relate appropriately to surrounding development. A masterplan approach to the area's development is supported, alongside the preparation of a public realm design guide/code, which is expected to support the placemaking vision for Southbury. As set out in the vision for Southbury, the area will have transformed into a coherent, exemplary, high-density, mixed-use quarter containing pocket parks and high quality public realm with new street trees and planting that offer a highly attractive environment to live and work in. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. The policy also supports the development of previously developed land, which would also help enhance the townscape. As such, a significant positive effect is expected in relation to **IIA16: Efficient use of land and materials**.

5.23 Although none of the allocated sites within the placemaking area fall within Flood Zones 2 or 3, most of them are at risk of surface water flooding with a predicted peak flood depth of greater than 300mm. However, flood risk mitigation will be provided through Policy DM SE8: Managing flood risk within the Local Plan. Therefore, overall, Policy SP PL2 is expected to have a minor negative effect in relation to **IIA17: Flooding**. A very small proportion of the Southbury placemaking area to the north falls within Source Protection Zone 2. Therefore, development under this policy could potentially cause a deterioration in water quality but due to the fact the area is already developed, the potential for contamination is reduced. Therefore, a minor negative effect is expected against **IIA18: Water**.

5.24 Negligible effects are expected in relation to IIA2: Climate change adaptation.

Edmonton Green

Table 5.3: IIA findings for Policy SP PL3: Edmonton Green

IIA objective	SP PL3: Edmonton Green
IIA1: Climate change mitigation	++/-
IIA2: Climate change adaptation	+
IIA3: Housing	++
IIA4: Health and wellbeing	++
IIA5: Services and facilities	+++?
IIA6: Social inclusion	++

IIA objective	SP PL3: Edmonton Green
IIA7: Crime and community safety	+
IIA8: Road safety	+
IIA9: Economy	++
IIA10: Town and local centres	++
IIA11: Air pollution	--/+
IIA12: Sustainable transport	++
IIA13: Biodiversity	+
IIA14: Historic environment	+?/-?
IIA15: Landscape and townscape	+?
IIA16: Efficient use of land and materials	++
IIA17: Flooding	+/-
IIA18: Water	+/-

5.25 Policy SP PL3: Edmonton Green seeks to revitalise Edmonton Green District Centre through the delivery of housing, workspace, town centre and community uses, in addition to supporting infrastructure. It includes one mixed-use allocation and one housing allocation. The policy is expected to have a mixed significant positive and minor negative effect in relation to **IIA1: Climate change mitigation** because the range of development types supported in Edmonton Green is expected to draw more residents and visitors into the area and could therefore increase the number of cars coming into the centre and associated CO₂ emissions. However, provision is made for new walking and cycling routes within the area and having a mix of uses all in one place will reduce the need for people to travel elsewhere by private car, helping minimise CO₂ emissions and air pollution. The placemaking area is within close proximity of a railway station (Edmonton Green) and contains a bus station, which is likely to encourage and facilitate the use of public transport. According to the policy, improvements will be made to bus services and connections to ensure good public transport access, and the Council will work with TfL and others to upgrade access and capacity at Edmonton Green railway station. The policy also requires major development to provide connections to and if possible extend the existing or planned future heat network and for minor developments to optimise opportunities to connect to existing heat networks – both of which would help minimise CO₂ emissions. Policy SP PL3 supports the integration of SuDS and urban greening to reduce flood risk and ensure a significant net gain in biodiversity and reduce the heat island effect. Therefore, a minor positive effect is expected in relation to **IIA2: Climate change adaptation**.

5.26 A significant positive effect is expected in relation to **IIA3: Housing** because a large number of new ones will be delivered within the placemaking area, with both site allocations expected to deliver more than 100 housing units each. Edmonton Green is located within 400m of a GP surgery and within 800m of a number of areas of open space, including Edmonton Green Linear Open Space and Plevna Road Local Park. According to the policy, distinctive features such as nearby greenspaces should be retained and enhanced, and the policy seeks to provide wider links to Angel Edmonton, Meridian Water and the Lee Valley Regional Park. The District Centre is also located within close proximity to walking and cycle routes, which the policy seeks to retain and extend. Therefore, a significant positive effect is expected in relation to **IIA4: Health and wellbeing**. A significant positive effect is also expected in relation to **IIA5: Services and facilities** because the policy supports a mix of uses and the District Centre is located within 800m of a number of primary schools. The effect is recorded as uncertain because it is unknown whether these schools have capacity for new pupils or not.

5.27 The placemaking area is located within the 10% most deprived areas within England and new development is therefore expected to help regenerate the area through a range of high quality new development types, with beneficial effects on social inclusion. Provision will also be made for affordable housing, in addition to walking and cycling routes, making the area more

accessible to those who may not have a car. A significant positive effect is therefore expected against **IIA6: Social inclusion**. The policy states that proposals will be expected to contribute to enhancing the public realm to make walking and cycling safer and more accessible and attractive, as well as to the introduction of urban greening between buildings, the shopping centre and railway line, to help create a lively street culture and safe environment. The policy also supports the potential removal of the current roundabout to connect the war memorial island to the station or concourse, which will provide safer more direct connections and more useable open space. All of these measures will improve safety within Edmonton Green, with minor positive effects expected in relation to **IIA7: Crime and community safety** and **IIA8: Road safety**.

5.28 Policy SP PL3 supports the development of a mix of uses, including commercial and workspace uses, which would create new jobs. Uses that support an evening and night-time economy are also encouraged. According to the policy, proposals for new employment generating development should be concentrated within the District Centre. This may include introducing a wider range of job opportunities, and leisure and food and beverage opportunities to diversify the centre and improve resilience. Although Edmonton Green is not located adjacent or close to Strategic Industrial Locations and Locally Significant Industrial Sites, the policy states that opportunities should be taken to deliver new and improved workspaces through the intensification of sites and along with improving the quality of existing employment spaces. As set out in the placemaking vision for Edmonton Green, it will become a revitalised district centre, with the policy specifically stating that development must ensure that a covered market continues to act as the focal point of a revitalised high street based shopping area. For these reasons, significant positive effects are expected against both **IIA9: Economy** and **IIA10: Town and local centres**.

5.29 Edmonton Green is located within close proximity of a railway station and contains a bus station, which is likely to encourage and facilitate the use of public transport and minimise air pollution associated with car use. The policy supports the retention and extension of walking and cycling routes and seeks to make walking and cycling more accessible through public realm enhancements. Providing a mix of uses in one area is also expected to reduce the need to travel elsewhere, as everyday amenities would all be within one place and therefore within walking distance of one another. Mitigation with respect to air quality is also provided under Policies SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice. However, revitalising Edmonton Green may attract more car trips to the area, with adverse effects on air quality. Indeed, both site allocations scored 2 in the air quality appraisal. The air quality appraisal gave consideration to the estimated housing capacity of each of the allocations and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. Therefore, a mixed significant negative and minor positive effect is expected in relation to **IIA11: Air pollution**.

5.30 Despite the potential for increased car use associated with new development, Policy SP PL3 supports car-free development and the retention and extension of walking and cycling routes within the area. The site is located adjacent to Edmonton Green Railway Station and contains a bus station, with the policy seeking to upgrade access and capacity at the railway station and to improve bus services and connections to ensure good public transport access. Therefore, a significant positive effect is expected in relation to **IIA12: Sustainable transport**.

5.31 Edmonton Green does not contain designated biodiversity assets but is within 250-750m of Pymme's Park SINC. However, mitigation is provided by Policy SP BG2: Protecting nature conservation sites in the Local Plan. Policy SP PL3 supports the retention and enhancement of greenspaces and the introduction of urban greening, with specific reference made to biodiversity net gain. Therefore, a minor positive effect is expected in relation to **IIA13: Biodiversity**. A mixed minor positive and minor negative effect is also expected in relation to **IIA14: Historic environment** because the site is within close proximity to four Conservation Areas and a number of Grade II* and Grade II listed buildings, in addition to containing an Archaeological Priority Area (APA15: Lower Edmonton). However, the policy states that development within Edmonton Green must demonstrate how it has responded appropriately to the components of historic and cultural heritage that form Edmonton Green's identity. Proposals are expected to contribute to removing the Fore Street and Church Street Conservation Areas from the Historic England register of Heritage at Risk and enhance those at The Crescent and Montagu Road cemeteries. Policy SP DE4: Putting heritage at the centre of placemaking in the Local Plan also provides mitigation. Further to this, Appendix B in the Local Plan requires a Heritage Impact Assessment to be undertaken for all allocations within the placemaking area and mitigation provided. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development.

5.32 Policy SP PL3 requires development within Edmonton Green to 'stitch back' into the surrounding context and provide more coherent and outward looking high streets creating new street-based routes which increase the prominence of entrances and reduce the prominence of servicing and inactive frontages. Enhancements to the public realm and urban greening are also proposed, in addition to the revitalisation of open spaces. Additionally, the policy states that the Council will use planning tools, such as the preparation of detailed design codes. With regard to tall buildings, these will only be permitted in locations identified

as being appropriate for tall buildings. Therefore, a minor positive effect is expected in relation to **IIA15: Landscape and townscape**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. The policy also supports the intensification of existing uses within Edmonton Green; therefore a significant positive effect is expected against **IIA16: Efficient use of land and materials**.

5.33 Edmonton Green contains a small area of land within Flood Zone 2 and both of the allocated sites within this placemaking area are at risk of surface water flooding, with one of them having a predicted peak flood depth of greater than 300mm and another having a predicted peak flood depth of 150mm. However, Policy SP PL3 supports the integration of SuDS and the introduction of rain gardens, swales and other sustainable drainage features, as well as opportunities to de-culvert Salmons Brook. Flood risk mitigation is also provided under Policy DM SE8: Managing flood risk. Therefore, Policy SP PL3 is expected to have a mixed minor positive and minor negative effect in relation to **IIA17: Flooding**. A mixed minor positive and minor negative effect is expected in relation to **IIA18: Water** because although the placemaking area partially falls within Source Protection Zone 2, sustainable drainage features can help protect water quality by preventing contamination from sediment runoff during construction and or increased pressure on wastewater treatment.

Angel Edmonton

Table 5.4: IIA findings for Policy SP PL4: Angel Edmonton

IIA objective	SP PL4: Angel Edmonton
IIA1: Climate change mitigation	++/-
IIA2: Climate change adaptation	0
IIA3: Housing	++
IIA4: Health and wellbeing	++/--?
IIA5: Services and facilities	++?
IIA6: Social inclusion	++
IIA7: Crime and community safety	+
IIA8: Road safety	++
IIA9: Economy	++
IIA10: Town and local centres	++
IIA11: Air pollution	--/+
IIA12: Sustainable transport	++
IIA13: Biodiversity	+/-
IIA14: Historic environment	-?
IIA15: Landscape and townscape	+?
IIA16: Efficient use of land and materials	++
IIA17: Flooding	+/-
IIA18: Water	+/-

5.34 Policy SP PL4: Angel Edmonton seeks to regenerate the area through residential-led mixed-use development and to contribute to improvements to blue and green infrastructure, in addition to SuDS enhancements and improved transport connections between Silver Street Railway Station and Fore Street. The policy includes four housing allocations. The policy is expected to have a mixed significant positive and minor negative effect in relation to **IIA1: Climate change mitigation** because it seeks to work towards car-free development in line with public transport improvements, in addition to improving the walking and cycling environment, all of which would discourage use of the private car and help minimise associated CO₂ emissions. As set out in the placemaking vision for Angel Edmonton, active travel will be the primary means of movement and new rapid transport and green active travel corridors will link the new neighbourhood at Meridian Water to Edmonton Green and Angel Edmonton. At present, the placemaking area contains one railway station (Silver Street) and a number of bus stops, which is expected to help reduce CO₂ emissions through a reduced reliance on the private car. However, regeneration of Angel Edmonton and the provision of employment uses may attract more residents to the area, increasing the number of cars on the road and associated CO₂ emissions.

5.35 Policy SP PL4 is expected to have a significant positive effect in relation to **IIA3: Housing** because three of the four site allocations are expected to deliver more than 100 housing units each. Furthermore, the policy states that development in Angel Edmonton must offer a range of housing typologies. As set out in Policy SP PL4, the health and wellbeing of residents will be protected through tree planting, the provision of wild meadows and other public realm works along the North Circular Road, so as to help minimise the effects of poor air quality. The placemaking area contains two GP surgeries and a number of areas of open space and is also located adjacent to others including Pymmes District Park. According to the policy, access to Pymmes Park should be improved and play space provided. However, some of the areas of open space within Angel Edmonton could be lost as a result of the development of SA15: Joyce Avenue and Snells Park Estate, although this is uncertain. Therefore, a mixed significant positive and significant negative effect is expected in relation to **IIA4: Health and wellbeing**, with uncertainty recorded against the potential negative effect. The vision for Angel Edmonton states that the High Street will be revitalised through community-led initiatives and new community facilities, schools and sports and recreational uses. Angel Edmonton contains a primary school and is located within 800m of further primary schools and a secondary school. Therefore, a significant positive effect is expected in relation to **IIA5: Services and facilities**. However, the effect is recorded as uncertain because it is unknown whether the schools have capacity for new pupils or not.

5.36 This placemaking area partially falls within the 10% most deprived areas within England and new high quality development is therefore expected to help regenerate the area, with beneficial effects on social including. The policy supports housing delivery, which will include affordable housing. Provision is also made for new spaces for culture and community uses, which may help contribute towards social cohesion. It is also likely that delivering improvements to the walking and cycling environment through the implementation of cycleways and enhancing the pedestrian environment could encourage uptake of active travel, making the area more accessible to those who may not have a car. Therefore, overall, a significant positive effect is expected in relation to **IIA6: Social inclusion**. With regard to **IIA7: Crime and community safety**, the policy states that access to Pymmes Park should be improved with better security and contributions will be sought towards this. Therefore, a minor positive effect is expected in relation to this objective. Policy SP PL4 is also expected to have a minor positive effect in relation to **IIA8: Road safety** because it seeks to contribute towards and/or facilitate improving connections between Silver Street Railway Station and Fore Street including markers for intuitive wayfinding and a variety of public realm spaces that are pedestrian and cycle friendly. Contributions will also be made towards improving the crossing facilities at North Circular Road, and prioritising active travel to better connect both sides of the road.

5.37 Policy SP PL4 is expected to have significant positive effects in relation to **IIA9: Economy** and **IIA10: Town and local centres** because Angel Edmonton is a District Centre and its regeneration is likely to increase footfall and therefore enhance its overall vitality and vibrancy. The policy seeks to provide new spaces for small business and employment uses that contribute towards the creation of a wide range of new jobs. The placemaking area is adjacent to a Locally Significant Industrial Site and residents would therefore have easy access to employment opportunities. According to the policy, provision of affordable workspace and creative studios in the area will also be supported.

5.38 Angel Edmonton contains one railway station (Silver Street) and a number of bus stops, which could encourage public transport use and reduce use of the private car and associated air pollution. The policy supports a move towards car-free development and seeks to encourage active travel choices through the implementation of cycleways and enhancements to the pedestrian environment. Walking is encouraged along North Circular Road through tree planting and wild meadows, which help mitigate the effects of poor air quality. Mitigation is also provided by Policy SP TE1: Promoting sustainable transport and DM T2: Making active travel the natural choice. However, the revitalisation of the District Centre could increase car trips into the area

and associated air pollution. Further to this, all four site allocations within the placemaking area scored 2 in the air quality appraisal. The air quality appraisal gave consideration to the estimated housing capacity of each of the allocations and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. Therefore, overall, a mixed significant negative and minor positive effect is expected in relation to **IIA11: Air pollution**.

5.39 Despite the potential for increases in car use associated with new development, Policy SP PL4 is expected to have a significant positive effect in relation to **IIA12: Sustainable transport** because Angel Edmonton contains a railway station and a number of bus stops, and the policy seeks to move towards car-free development by promoting active travel choices through the implementation of cycleways and enhancements to the pedestrian environment.

5.40 Angel Edmonton does not contain any designated biodiversity assets but is within 250m of Pymmes Park SINC and Priority Habitats, although mitigation is provided through Policy SP BG2: Protecting nature conservation sites in the Local Plan. Policy SP PL4 supports the provision of play space at Pymmes Park which could potentially result in adverse effects on the SINC through increased recreational use. However, Policy SP PL4 also supports improvements to the blue and green infrastructure network, in addition to tree planting and the provision of wild meadows along North Circular Road. Therefore, overall, a mixed minor positive and minor negative effect is expected in relation to **IIA13: Biodiversity**.

5.41 Angel Edmonton contains Fore Street South Conservation Area and partially overlaps Fore Street Angel Conservation Area, the latter of which contains a number of Grade II listed buildings. The placemaking area is also located within 500m of Fore Street North Conservation Area. The area contains an Archaeological Priority Area (APA20: Upper Edmonton). Due to the placemaking area's proximity to these Conservation Areas and listed buildings, development could affect the setting of these heritage assets, in addition to the Archaeological Priority Area. However, mitigation is provided in the form of Policy DM D4: Putting heritage at the centre of placemaking. Further to this, Appendix B in the Local plan requires a Heritage Impact Assessment to be undertaken for all allocations within the placemaking area and mitigation provided. Therefore, overall, Policy SP PL4 is expected to have a minor negative effect in relation to **IIA14: Historic environment**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development.

5.42 A minor positive effect is expected in relation to **IIA15: Landscape and townscape** because Policy SP PL4 requires regeneration of Angel Edmonton to respond positively to the unique context and characteristics of the area, and for proposals elsewhere to respect the predominantly lower-rise character of the area. The policy states that tall buildings will only be accepted in appropriate locations. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. Policy SP PL4 is expected to have a significant positive effect in relation to **IIA16: Efficient use of land and materials** because the placemaking area contains previously developed land that has been allocated for housing.

5.43 A small proportion of the Angel Edmonton placemaking area falls within Flood Zone 3 and all of the allocated sites within this placemaking area are at risk of surface water flooding, with a predicted peak flood depth of greater than 300mm. However, the policy states that contributions should be made towards SuDS enhancements and that opportunities to de-culvert Pymmes Brook should be explored. Mitigation is also provided in the form of Policy DM SE8: Managing flood risk. Therefore, a mixed minor positive and minor negative effect is expected in relation to **IIA17: Flooding**. A mixed minor positive and minor negative effect is expected in relation to **IIA18: Water** because although the placemaking area partially falls within Source Protection Zone 2, SuDS can help protect water quality by preventing contamination from sediment runoff during construction and or increased pressure on wastewater treatment.

5.44 Negligible effects are expected in relation to IIA2: Climate change adaptation.

Meridian Water

Table 5.5: IIA findings for Policy SP PL5: Meridian Water

IIA objective	SP PL5: Meridian Water
IIA1: Climate change mitigation	++/--
IIA2: Climate change adaptation	+
IIA3: Housing	++

IIA objective	SP PL5: Meridian Water
IIA4: Health and wellbeing	++
IIA5: Services and facilities	++
IIA6: Social inclusion	++
IIA7: Crime and community safety	0
IIA8: Road safety	+
IIA9: Economy	++
IIA10: Town and local centres	++
IIA11: Air pollution	--/+
IIA12: Sustainable transport	++/-
IIA13: Biodiversity	+
IIA14: Historic environment	0?
IIA15: Landscape and townscape	+?
IIA16: Efficient use of land and materials	++
IIA17: Flooding	+/-
IIA18: Water	+/-

5.45 Policy SP PL5: Meridian Water seeks to deliver a residential-led mixed-use development scheme containing a large new Local Centre, in addition to open space and ecological enhancements. It includes one mixed-use allocation and one industrial allocation. The policy references existing planned transport improvements and states that development will be supported where it contributes towards the enhancement of the existing network of routes, namely Leaside Road, Glover Drive and Angel Edmonton Road. This could promote use of the private car and contribute towards CO₂ emissions, but improvements to highways infrastructure should also decrease congestion and associated concentrations of emissions. The policy states that development should deliver new strategic connections from Meridian Water to key destinations such as Edmonton Green, North Middlesex Hospital and Angel Edmonton, in addition to neighbouring boroughs but does not specify whether this refers to the strategic road network or public transport. However, the policy supports improvements to rail and bus provision, active travel and new routes across the placemaking area to improve accessibility and connectivity. It also makes provision for a network of green corridors, which are likely to provide walking and cycling routes for residents. The placemaking area contains a railway station (Meridian Water) and a number of bus stops, which is also likely to encourage and facilitate the use of public transport, which will help minimise CO₂ emissions associated with car use. A mixed-use development will also mean that everyday facilities are located in one place and therefore people do not have to travel far to reach most amenities. The policy requires primary routes through the area to form a key route for essential infrastructure, including decentralised energy, gas and electricity networks, which would also help minimise CO₂ emissions. Therefore, overall, a mixed significant positive and significant negative effect is expected in relation to **IIA1: Climate change mitigation**. A minor positive effect is expected in relation to **IIA2: Climate change adaptation** because the policy requires development within the placemaking area to contain flood mitigation infrastructure, in addition to off-site flood attenuation basins/conveyance channels to divert surface water run-off where this cannot be delivered on site.

5.46 Policy SP PL5 is expected to have a significant positive effect in relation to **IIA3: Housing** because one of the two allocations makes provision for 5,000 new housing units. The policy seeks to deliver a range of alternative housing products to increase the quantum and pace of delivery, and support is given for high quality 'build to rent' schemes as an element of the

provision of private housing. According to the policy, the need for co-living, older person's accommodation and student accommodation should also be explored. Significant positive effects are also expected in relation to **IIA4: Health and wellbeing** and **IIA5: Services and facilities** because the policy states that development should make a significant, positive contribution to both physical and social infrastructure, which will include the delivery of a new primary school and a new health centre as a minimum. Indeed, the placemaking area does not currently contain a GP surgery, with the nearest one located within 400-800m of the placemaking area. The placemaking area is, however, within 800m of existing primary schools. The policy also requires development proposals to explore opportunities for the delivery of water sports facilities along the Lee Valley Navigation canal, which could encourage increased levels of physical exercise. Provision will also be made for open space and there is a requirement within the policy for each phase of development to meet the 30% public open space target as a minimum and to seek to deliver the maximum open space possible. Related to this point is the requirement to deliver high quality, varied play through a combination of designated and informal playable space. Doorstep play must also be provided within individual plots. The delivery of a residential-led mixed-use scheme will also ensure that there is a wide range of services and facilities available within one area.

5.47 Meridian Water is located within one of the 20% most deprived areas within England and the proposed new development is therefore expected to help regenerate the area through the residential-led mixed-use development scheme, with beneficial effects on social inclusion. A significant number of new housing units will be provided, a large proportion of which will be affordable housing units. According to the placemaking vision for Meridian Water, it will be a place where Enfield residents and Londoners can afford to live, providing an opportunity for everyone. The policy makes provision for a new large Local Centre and states that development within the new local centre must create new spaces for small business, culture and community uses, aiding social inclusion. Open space provision will help to address inequalities in access to open space, whilst active travel and new walking and cycling routes, in addition to improvements to rail and bus provision, will make the area more accessible to those who may not have access to a car. The policy also makes reference to the need for co-living, older person's accommodation and student accommodation. Therefore, overall, a significant positive effect is expected in relation to **IIA6: Social inclusion**. A minor positive effect is expected in relation to **IIA8: Road safety** because the policy seeks to facilitate and contribute towards the enhancement of the existing network of routes and strategic connections from Meridian Water to key destinations and neighbouring boroughs, to overcome any physical severance. The policy also supports roadside improvements, such as underpass treatment and bridges, all of which have the potential to increase road safety.

5.48 According to the vision for Meridian Water, it will continue to be a place of innovation and industry that has adapted and evolved to modern needs, delivering new jobs and opportunities on a scale which will transform the Borough's employment base. The policy states that development within Meridian Water should contribute to generating a mix of high-quality permanent jobs, as well as jobs through meanwhile uses and construction jobs, with no less than 25% from local labour. To deliver the permanent jobs, development should provide a mix of employment spaces in appropriate locations. High speed broadband will also help contribute towards economic growth. The place making area contains a Strategic Industrial Location and is located close to another Strategic Industrial Location, as well as a Locally Significant Industrial Site. Therefore, new residents would be located within close proximity of employment opportunities. According to the policy, the Strategic Industrial Location will be safeguarded as a SIL for this Plan period, but that may change in future plan periods to ensure that future aspirations are not undermined through planning consent on this land in the Plan period. Therefore, overall, Policy SP PL5 is expected to have a significant positive effect in relation to **IIA9: Economy**. A significant positive effect is also expected in relation to **IIA10: Town and local centres** because the policy makes provision for a new large Local Centre, which will be supported by a wide range of complimentary uses. Development within the new local centre must create new spaces for small businesses.

5.49 Meridian Water contains a railway station and a number of bus stops, which would encourage modal shift and help to minimise air pollution from car use. The policy supports improvements to rail and bus provision, active travel and new routes across proposed development sites to improve accessibility and connectivity. It also makes provision for a network of green corridors, which are likely to provide walking and cycling routes for residents. Providing a mix of uses within one area is also likely to encourage more active travel choices as different services will be within walking distance of one another. Mitigation provided under Policy SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice would also help encourage more active and sustainable travel choices. However, the residential-led mixed-use development scheme may attract more residents and workers to the area, which could increase the number of cars on the road with adverse effects on air quality. Both of the site allocations associated with this placemaking policy scored 2 in the air quality appraisal. The air quality appraisal gave consideration to the estimated housing capacity of the mixed-use sites and the area of the industrial site option and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. Therefore, a mixed significant negative and minor positive effect is expected in relation to **IIA11: Air pollution**.

5.50 Policy SP PL5 is expected to have a mixed significant positive and minor negative effect in relation to **IIA12: Sustainable transport** because although Meridian Water contains a railway station and a number of bus stops, which is likely to encourage and facilitate the use of public transport, the policy also seeks to facilitate and contribute towards the enhancement of the existing network of routes, in particular Leaside Road, Glove Drive and Angel Edmonton Road, which could encourage more road transport. The policy also requires development to deliver new strategic connections from Meridian Water to key destinations and neighbouring boroughs to overcome physical severance but the policy does not specify whether this refers to the strategic road network or public transport. However, the policy supports improvements to rail and bus provision, active travel and new routes across the placemaking area to improve accessibility and connectivity, and makes provision for a network of green corridors, which are likely to provide walking and cycling routes for residents, hence the mixed effect on this IIA objective.

5.51 Meridian Water contains Priority Habitats (deciduous woodland) and is located adjacent to Lea Valley SINC, with the safeguarded land on the "east bank" located within 250-750m of Chingford Reservoirs SSSI. According to the supporting figure to Policy SP PL5, improvements will be made to the Kenninghall Amenity Green Space which comprises Priority Habitat. Mitigation for potential effects on other biodiversity assets will be provided through Policy SP BG2: Protecting nature conservation sites. The placemaking policy makes provision for a network of green corridors and seeks to maximise the experience, activation and ecological potential of the existing waterways in the area through naturalisation and ecological enhancements where possible. The policy also seeks to deliver a net gain in biodiversity and states that planting must be consistent with the habitats and character of the Lee Valley Regional Park and must be composed of a diverse range of native species in accordance with the Lee Valley Biodiversity Action Plan. Therefore, overall, Policy SP PL5 is expected to have a minor positive effect in relation to **IIA13: Biodiversity**.

5.52 Meridian Water is located within 500m of Montagu Cemeteries Conservation Area, whilst the safeguarded land is located within 500m of three Grade II listed buildings. The placemaking area contains an Archaeological Priority Area (APA4: Lea Valley West Bank). New development is unlikely to have an adverse effect on the Conservation Area and the setting of the listed buildings, in addition to the Archaeological Priority Area because the placemaking area already contains built development and mitigation is provided by Policy SP DE4: Putting heritage at the centre of placemaking. Further to this, Appendix B in the Local Plan requires a Heritage Impact Assessment to be undertaken for one of the allocations within the placemaking area. Therefore, a negligible effect is likely in relation to **IIA14: Historic environment** although this is recorded as uncertain because the placemaking area could still have some potential for impacts on non-designated heritage features.

5.53 Policy SP PL5 is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape** because the policy requires development within Meridian Water to be seamlessly woven into the surrounding context, which is characterised by suburban low-rise buildings. Provision is made for open space throughout the policy and development is to provide a clearly delineated centre in the form of a central east-west spine that is connected to a variety of public realm spaces including pocket gardens and squares. According to the policy, planning permission for individual phases must conform with a masterplan for the whole placemaking area, which is likely to give consideration to the existing landscape. Further to this, the vision for Meridian Water states that development will offer views across the Lee Valley Regional Park. The minor positive effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. The policy supports development within the Meridian Water placemaking area, which almost entirely comprises brownfield land. Additionally, the vision states that Meridian Water will be a zero waste development. As such, a significant positive effect is expected in relation to **IIA16: Efficient use of land and materials**.

5.54 The Meridian Water placemaking area partially falls within Flood Zone 3 and both of the allocated sites within this placemaking area are at risk of surface water flooding, with a predicted peak flood depth of greater than 300mm. However, Policy SP PL5 requires development within Meridian Water to contribute towards river restoration works, including naturalisation of the riverbanks and off-site flood attenuation basins/conveyance channels to divert surface water run-off where this cannot be delivered on site. Flood risk mitigation is also provided under Policy DM SE8: Managing flood risk. Therefore, a mixed minor positive and minor negative effect is expected in relation to **IIA17: Flooding**. A mixed minor positive and minor negative effect is also expected in relation to **IIA18: Water** because although the placemaking area partially falls within Source Protection Zones 1 and 2, naturalisation of the riverbanks and off-site flood attenuation basins/conveyance channels will help prevent and contamination from sediment runoff. Policy SP PL5 also seeks to maximise the ecological potential of the existing waterways through naturalisation and ecological enhancements where possible, which is expected to enhance water quality.

5.55 Negligible effects are expected in relation to IIA7: Crime and community safety.

Southgate

Table 5.6: IIA findings for Policy SP PL6: Southgate

IIA objective	SP PL6: Southgate
IIA1: Climate change mitigation	++/-
IIA2: Climate change adaptation	0
IIA3: Housing	++
IIA4: Health and wellbeing	++/-
IIA5: Services and facilities	+?
IIA6: Social inclusion	+
IIA7: Crime and community safety	0
IIA8: Road safety	+
IIA9: Economy	++
IIA10: Town and local centres	++
IIA11: Air pollution	--/+
IIA12: Sustainable transport	++
IIA13: Biodiversity	+
IIA14: Historic environment	+?/-?
IIA15: Landscape and townscape	++?
IIA16: Efficient use of land and materials	++
IIA17: Flooding	-
IIA18: Water	0

5.56 Policy SP PL6: Southgate supports the renewal of Southgate District Centre through the delivery of new homes and employment floorspace in addition to town centre uses, whilst protecting the distinctive character and heritage of the area. It includes three mixed-use site allocations and one housing allocation. The policy is expected to have a mixed significant positive and minor negative effect in relation to **IIA1: Climate change mitigation** because it requires development to work towards car-lite development and a reduced reliance on surface car parks, in addition to requiring development to contribute towards enhancing the pedestrian environment. The supporting figure to the policy shows that new walking and cycling opportunities will be introduced to the area and improvements will be made to existing walking routes. Therefore, it is likely this policy will reduce reliance on the private car and help minimise associated CO₂ emissions. Providing a mix of uses in one area will also reduce reliance on the private car because more services and facilities will be located within walking distance of one another. The placemaking area contains a tube station (Southgate) and a number of bus stops which may also reduce reliance on the private car. However, providing a range of uses within Southgate may draw more residents and visitors into the area and increase the number of cars on the road and associated CO₂ emissions.

5.57 Policy SP PL6 is expected to have a significant positive effect in relation to **IIA3: Housing** because a large number of homes will be delivered within the placemaking area, with three of the four allocations expected to deliver more than 100 housing units each. A mixed significant positive and minor negative effect is expected in relation to **IIA4: Health and wellbeing**

because although the placemaking area is more than 800m from the nearest GP surgery, it contains areas of open space and is also located within 800m of a number of other areas of open space, in addition to walking and cycling routes. The policy seeks to enhance and improve access to parks and open spaces within the vicinity of the area, including but not limited to Arnos Park, Minchenden Oak Garden, Southgate Grovelands Park and Ivy Road Recreation Ground. A potential but uncertain minor positive effect is identified in relation to **IIA5: Services and facilities** because the policy supports the development of a mix of uses, which may include education facilities. The placemaking area contains a primary school and is located within 800m of further primary schools but is not within 800m of a secondary school. The minor positive effect is recorded as uncertain because it is unknown whether these existing schools have capacity for new pupils or not.

5.58 A minor positive effect is expected in relation to **IIA6: Social inclusion** because, while the placemaking area is not located within one of the 20% most deprived areas within England, affordable housing would be provided as part of development. Additionally, the policy makes provision for small creative businesses and business start-ups. A minor positive effect is also expected in relation to **IIA8: Road safety** because the policy requires development to contribute towards enhancing the pedestrian environment, which is likely to improve pedestrian safety.

5.59 Policy SP PL6 is expected to have significant positive effects in relation to **IIA9: Economy** and **IIA10: Town and local centres**. Although the area is not located adjacent or close to a Locally Significant Industrial Site or a Strategic Industrial Location, it seeks to provide an expanded or intensified district centre by supporting proposals for small creative businesses and business start-ups, encouraging meanwhile and temporary use of vacant shop units and small office spaces around the High Street. According to the vision for the placemaking area, existing and new clusters of small to medium office spaces will take advantage of good links to central London. The policy also seeks to support a growing and night-time economy, with changes to non-town centre uses not permitted unless appropriate evidence can be provided to demonstrate why this is acceptable.

5.60 Southgate contains a tube station and a number of bus stops, which could encourage modal shift and help minimise air pollution from car use. Policy SP PL6 requires development proposals to work towards car-lite development and a reduced reliance on surface car parks, in addition to requiring development to contribute towards enhancing the pedestrian environment. Therefore, Policy SP PL6 is expected to help minimise air pollution associated with car use. Locating a mix of uses all in one area is also expected to reduce car use as a wide range of services and facilities will be within walking distance of one another. Mitigation is also provided through Policies SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice, both of which promote more active and sustainable travel choices. However, the renewal of Southgate District Centre may draw more residents and visitors into the area, which could increase the number of cars on the road with adverse effects on air quality. Indeed, all of the site allocations within the placemaking area scored 2 in the air quality appraisal. The air quality appraisal gave consideration to the estimated housing capacity of each of the allocations and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. Therefore, a mixed significant negative and minor positive effect is expected in relation to **IIA11: Air pollution**.

5.61 Despite the potential for increased car use associated with new development, Policy SP PL6 is expected to have a significant positive effect in relation to **IIA12: Sustainable transport** because Southgate contains a tube station and a number of bus stops. Therefore, focusing growth within the centre is likely to encourage the use of public transport. Further to this, the policy requires development proposals to work towards car-lite development and a reduced reliance on surface car parks, in addition to requiring development to contribute towards enhancing the pedestrian environment. The supporting figure to the policy shows that new walking and cycling opportunities will be introduced to the area and improvements will be made to existing walking routes.

5.62 The Southgate placemaking area is located within 250m of Grovelands Park and Priory Hospital SINC, which contains Priority Habitats. However, the policy states that development should enhance and improve Grovelands Park, and further mitigation is provided through Policy SP BG2: Protecting nature conservation sites. Therefore, a minor positive effect is expected in relation to **IIA13: Biodiversity**.

5.63 Southbury placemaking area contains Southgate Circus Conservation Area and a number of Grade II* and Grade II listed buildings. Southgate is also located within 500m of Grovelands Registered Park and Garden and Medway Conservation Area and Southgate Green Conservation Area. The placemaking area contains an Archaeological Priority Area (APA25: Grovelands Park and Southgate Green). Therefore, development could have an adverse effect on the Conservation Areas and on the settings of the listed buildings, in addition to the Archaeological Priority Area. However, the policy states that development in Southgate must be shaped by the distinctive character and heritage in the area, with particular regard to the listed tube station of outstanding national significance and its surroundings, in addition to the interwar shopping parades, historic high streets and

distinctive suburban housing. According to the vision for the area, Southgate will be a thriving district centre that has a unique character derived from the listed tube station and other heritage assets. Mitigation is also provided through Policy SP DE4: Putting heritage at the centre of placemaking within the Local Plan. Further to this, Appendix B in the Local Plan requires a Heritage Impact Assessment to be undertaken for all allocations within the placemaking area and mitigation provided. Therefore, overall, Policy SP PL6 is expected to have a mixed minor positive and minor negative effect against **IIA14: Historic environment**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development.

5.64 A significant positive effect is expected in relation to **IIA15: Landscape and townscape** because Policy SP PL6 requires development within Southgate to respond positively to the unique context and characteristics of the area. New homes should be delivered through high density development that also preserves key views of the stations, with tall buildings only acceptable in locations identified as being suitable. According to the policy, development should create an improved sense of place by the station and the Council will work in partnership with key stakeholders and landowners to devise a cohesive public realm strategy. The strategy will be focused around the station to improve the sense of arrival and around the shopping parades to create a more pedestrian friendly environment. The significant positive effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. The policy also supports development on previously developed land, in addition to the meanwhile and temporary use of vacant shop units; therefore a significant positive effect is also expected in relation to **IIA16: Efficient use of land and materials**.

5.65 Although none of the allocated sites within this placemaking area fall within Flood Zones 2 or 3, most of them are at risk of surface water flooding, with a predicted peak flood depth of greater than 300mm. However, flood risk mitigation will be provided through Local Plan Policy DM SE8: Managing flood risk. Overall, therefore, Policy SP PL6 is expected to have a minor negative effect in relation to **IIA17: Flooding**.

5.66 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA7: Crime and community safety and IIA18: Water.

New Southgate

Table 5.7: IIA findings for Policy SP PL7: New Southgate

IIA objective	SP PL7: New Southgate
IIA1: Climate change mitigation	++/-
IIA2: Climate change adaptation	0
IIA3: Housing	++
IIA4: Health and wellbeing	++
IIA5: Services and facilities	+++?
IIA6: Social inclusion	++
IIA7: Crime and community safety	+
IIA8: Road safety	+
IIA9: Economy	+
IIA10: Town and local centres	+
IIA11: Air pollution	--/+
IIA12: Sustainable transport	++
IIA13: Biodiversity	+/-

IIA objective	SP PL7: New Southgate
IIA14: Historic environment	-?
IIA15: Landscape and townscape	+?
IIA16: Efficient use of land and materials	++
IIA17: Flooding	-
IIA18: Water	+

5.67 Policy SP PL7: New Southgate seeks to deliver a mix of uses within New Southgate and an enhanced public realm, in addition to an appropriate distribution of green open spaces across the area and river restoration projects within Arnos Park. It includes two mixed-use site allocations and one housing allocation. Policy SP PL7 seeks to make walking and cycling significantly more accessible and safer through the delivery of an attractive public realm and active frontages, particularly along Bowes Road, the A406 and Station Road. Use of public transport may also be encouraged as the area contains a tube station (Arnos Grove) and a railway station (New Southgate), in addition to a number of bus stops. However, the development of a mix of uses within the area may draw more residents into the area and could therefore increase the number of cars coming into the area and associated CO₂ emissions. Therefore, an overall mixed significant positive and minor negative effect is expected in relation to **IIA1: Climate change mitigation**.

5.68 Policy SP PL7 is expected to have a significant positive effect in relation to **IIA3: Housing** because a large number of new housing units will be delivered within the placemaking area, with all three allocations expected to deliver in excess of 100 housing units each. According to the policy, a range of housing typologies will be provided. The policy is also expected to have a significant positive effect in relation to **IIA4: Health and wellbeing** because the policy supports the delivery of a mix of uses, which may include healthcare facilities. The placemaking area contains a GP surgery and a number of open spaces which, according to the supporting figure to the policy, will be improved. The policy specifically states that contributions will be made towards enhancing existing local open spaces and that improvements will be made to provide play opportunities for all ages within existing parks. A new play park for young children is also proposed in the High Road open space. A significant positive effect is also expected in relation to **IIA5: Services and facilities** because the placemaking area contains primary schools and is also located within 800m of a further primary school and a secondary school. As noted above, the policy supports a mix of uses including community facilities, as well as improvements to Bowes Road Library, subject to funding. The policy also supports the development of new hub facilities around Grove Road open space. The significant positive effect is recorded as uncertain because it is unknown whether the schools have capacity for new students or not.

5.69 The New Southgate placemaking area is partially located within the 20% most deprived areas within England and new development is therefore expected to help regenerate the area through a range of development types, with beneficial effects on social inclusion. Provision will also be made for affordable housing and walking and cycling will be made more accessible through public realm improvements. Therefore, a significant positive effect is expected in relation to **IIA6: Social inclusion**. Policy SP PL7 is expected to have a minor positive effect in relation to **IIA7: Crime and community safety** because according to the supporting figure to the policy, active frontages will be promoted along a couple of roads, which is a form of passive surveillance. Additionally, the policy supports improvements to parks such as enhanced lighting, which will help ensure people are safe at night. A minor positive effect is also expected in relation to **IIA8: Road safety** because the policy seeks to contribute towards improving links along key routes to the tube and railway station through public realm improvements, in addition to making cycle and walking routes safer.

5.70 Policy SP PL7 seeks to create a thriving mixed-use place and according to the vision for New Southgate, supports the revitalisation of the shopping areas at both Arnos Grove tube station and New Southgate railway station. Therefore, a minor positive effect is expected in relation to **IIA9: Economy**. New Southgate contains a number of local centres and its redevelopment is expected to increase footfall within these centres, contributing to their vitality. Therefore, a minor positive effect is also expected in relation to **IIA10: Towns and local centres**.

5.71 New Southgate contains a tube station and a railway station, in addition to a number of bus stops, which could discourage use of the private car and help minimise associated air pollution. Policy SP PL7 seeks to make walking and cycling safer and

more accessible. Providing a mix of used within one area is also expected to encourage more active travel choices as different services will be within walking distance of one another. Mitigation provided through Policy SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice would also help encourage more active and sustainable travel choices. However, development within New Southgate may attract more people to the area and subsequent car trips into the area, which would contribute towards poor air quality. Indeed, all three site allocations scored 2 in the air quality appraisal. The air quality appraisal gave consideration to the estimated housing capacity of each of the allocations and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site. Therefore, a mixed significant negative and minor positive effect is expected in relation to **IIA11: Air pollution**.

5.72 Despite the potential for increased car use associated with new development, Policy SP PL7 is expected to have a significant positive effect in relation to **IIA12: Sustainable transport** because New Southgate contains a tube station and a railway station, in addition to a number of bus stops. The policy also supports enhancements to walking and cycling routes. Therefore, focusing growth within the area is expected to encourage public transport use.

5.73 The placemaking area contains a Priority Habitat (deciduous woodland) and is within 250m of Arnos Park SINC, which also contains some Priority Habitats. However, Policy SP BG2: Protecting nature conservation sites will help mitigate against any effects development might have on biodiversity. Therefore, a mixed minor positive and minor negative effect is expected in relation to **IIA13: Biodiversity**.

5.74 The New Southgate placemaking area contains one Grade II* listed building (Arnos Grove Underground Station) and two Grade II listed buildings (Bowes Road Library and Arnos Pool and Bowes Road Clinic) and is within 500m of one other Grade II listed building (188-200 Bowes Road). Therefore, development could have an adverse effect on the setting of these listed buildings. However, mitigation is provided through Local Plan Policy SP DE4: Putting heritage at the centre of placemaking. Therefore, overall, a minor negative effect is expected in relation to **IIA14: Historic environment**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development.

5.75 With regard to the landscape, Policy SP PL7 requires development in New Southgate to be delivered via a masterplan, particularly around the western gateway sites. The masterplan is likely to give consideration to the landscape of the area, with Policy SP PL7 also stating that contributions will be sought towards improvements to the public realm and townscape along the large roads bounding the area (i.e. Bowes Road, A406 and Station Road). Contributions will also be sought towards enhancing existing local open spaces. According to the vision for the place, New Southgate will act as a new enhanced gateway to the Borough and offer exemplary quality development on its western edge with housing alongside modern employment space. Therefore, Policy SP PL7 is expected to have a minor positive effect in relation to **IIA15: Landscape**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development. Policy SP P7 is expected to have a significant positive effect in relation to **IIA16: Efficient use of land and materials** because the placemaking area contains previously developed land that has been allocated for housing.

5.76 A very small proportion of New Southgate contains land that falls within Flood Zone 3 and all of the allocated sites within this placemaking area are at risk of surface water flooding, with a predicted peak flood depth of greater than 300mm. Despite this, flood risk mitigation will be provided through Local Plan Policy DM SE8: Managing flood risk. Therefore, overall, a minor negative effect is expected in relation to **IIA17: Flooding**. A minor positive effect is expected overall in relation to **IIA18: Water** as the policy requires development proposals to contribute to river restoration projects, which are likely to help improve water quality.

5.77 Negligible effects are expected in relation to IIA2: Climate change adaptation.

Rural Enfield – a leading destination in the London National Park City

Table 5.8: IIA findings for Policy SP PL8: Rural Enfield – a leading destination in the London National Park City

IIA objective	SP PL8: Rural Enfield – a leading destination in the London National Park City
IIA1: Climate change mitigation	++/-
IIA2: Climate change adaptation	+

IIA objective	SP PL8: Rural Enfield – a leading destination in the London National Park City
IIA3: Housing	0
IIA4: Health and wellbeing	++
IIA5: Services and facilities	+
IIA6: Social inclusion	+
IIA7: Crime and community safety	0
IIA8: Road safety	+
IIA9: Economy	++
IIA10: Town and local centres	0
IIA11: Air pollution	++/-
IIA12: Sustainable transport	+/-
IIA13: Biodiversity	++
IIA14: Historic environment	+?
IIA15: Landscape and townscape	++
IIA16: Efficient use of land and materials	-?
IIA17: Flooding	+
IIA18: Water	+

5.78 Policy SP PL8: Rural Enfield – a leading destination in the London National Park City sets out the different ways in which the northern area of the Borough will be transformed into the leading outdoor countryside destination in North London and surrounding areas and how it will serve as a unique and exemplar place for London's 'National Park City'. Policy SP PL8 is expected to have a mixed significant positive and minor negative effect in relation to **IIA1: Climate change mitigation** because it supports the Enfield Chase re-wilding programme which will see the development of 1,000ha of woodland, which will help aid carbon absorption. However, the policy supports tourism and recreational, sport and leisure activities, which may draw visitors into the area and subsequently increase traffic, contributing towards CO₂ emissions. In order to mitigate this potential effect, the policy requires the delivery of new or improved walking and cycling routes between key railway stations, town centres and cultural attractions within the area, as well as along watercourses. A minor positive effect is expected in relation to **IIA2: Climate change adaptation** because the policy supports sustainable drainage systems and wetland creation so as to reduce the impacts of development downstream. In addition, the Enfield Chase re-wilding programme, which includes 1,000 ha of proposed woodland may contribute to reducing wider urban heat island effects within Enfield and other London boroughs.

5.79 Policy SP PL8 is expected to have a significant positive effect in relation to **IIA4: Health and wellbeing** because it supports improved hubs of sporting excellence at the Tottenham Hotspur training ground and Ponders End, and is therefore likely to encourage physical exercise, with beneficial effects on people's health. The policy also supports the development of a 1,000ha woodland and open space, which will have beneficial effects on air quality through carbon absorption and may help prevent health conditions associated with poor air quality (e.g. asthma). The delivery of new or improved walking and cycling routes is also expected to increase levels of physical exercise amongst local people. A minor positive effect is expected against **IIA5: Services and facilities** because as mentioned noted, Policy SP PL8 supports improved hubs of sporting excellence and reference is made in the policy to the development of a visitor centre, which could be used for educational purposes.

5.80 A minor positive effect is expected in relation to **IIA6: Social inclusion** because Rural Enfield contains some areas that fall within the 20% most deprived in England and the creation of an outdoor countryside destination is expected to help bridge any gaps there may be in access to the countryside, as well as open space. A minor positive effect is also expected in relation to **IIA8: Road safety** because the policy supports improvements to walking and cycling routes, which may increase their safety.

5.81 Policy SP PL8 is expected to have a significant positive effect in relation to **IIA9: Economy** because it supports the transformation of Rural Enfield into a leading outdoor countryside destination and will therefore stimulate the tourism industry. The policy supports the creation of a new cultural gateway hub at Enfield Chase, including a new visitor centre, and will also support the rural economy through the conversion of publicly-owned farmland into sustainable agricultural/forestry and horticultural units. According to the vision for the area, community involvement and sustainable green enterprises will enable the local rural economy to thrive.

5.82 A mixed significant positive and minor negative effect is expected in relation to **IIA11: Air pollution** because Policy SP PL8 supports the development of a 1,000ha woodland which will help absorb CO₂ emissions, with beneficial effects on air quality. However, the policy seeks to transform Rural Enfield into a leading outdoor countryside destination, which may draw a large number of visitors into the area who may be travelling via car. Some mitigation should be provided through Policies SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice in the Local Plan which discourage car use.

5.83 A mixed minor positive and minor negative effect is expected in relation to **IIA12: Sustainable transport** because although Policy SP PL8 supports new or improved walking and cycling routes between railway stations, town centres and cultural attractions, as well as along watercourses, Rural Enfield is poorly connected in terms of public transport. Therefore, it is still likely that people will have to travel via car to reach the destination.

5.84 Policy SP PL8 is expected to have a significant positive effect in relation to **IIA13: Biodiversity** because it supports the development of 1,000ha of woodland and open space as part of a major nature recovery network within Enfield Chase. The policy also supports proposals for biodiversity offsetting within Rural Enfield and, with regard to flood risk mitigation, supports wetland creation. Promoting food growing areas and gardens is also expected to increase biodiversity.

5.85 Rural Enfield contains a number of Conservation Areas, Listed Buildings, Scheduled Monuments and Registered Parks and Gardens, in addition to Archaeological Priority Areas. However, Policy SP PL8 seeks to prevent any non-essential development from taking place in the north of the Borough. Therefore, it is unlikely that this policy would result in an adverse effect on the historic environment. According to Policy SP PL8, proposals for the sensitive restoration of historic parks and gardens at Trent Park, Forty Hall and Myddelton House are supported. Mitigation is also provided in the form of Policy SP DE4: Putting heritage at the centre of placemaking. Overall, therefore, a minor positive effect is expected in relation to **IIA14: Historic environment**. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of any development that might take place within the area.

5.86 A significant positive effect is expected in relation to **IIA15: Landscape and townscape** because Policy SP PL8 prevents development from taking place within Rural Enfield that may adversely affect the openness of the Green Belt and Metropolitan Open. According to the policy, new development should be designed to sensitively integrate physically and visually with Enfield Chase and Lee Valley Regional Park, particularly in relation to skylines, key entrance points, strategic views and valued landscapes. The policy also supports the delivery of a 1,000ha woodland and open space, which would have beneficial effects on the landscape.

5.87 A minor negative effect is expected in relation to **IIA16: Efficient use of land and materials** because Rural Enfield comprises greenfield land, much of which is classed as Grade 3 agricultural land. Therefore, if development were to take place, it would not be an efficient use of previously developed land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is considered to be high quality while Grade 3b is not).

5.88 A minor positive effect is expected in relation to **IIA17: Flooding** because although Rural Enfield contains a small proportion of land that falls within Flood Zone 3, Policy SP PL8 supports flood risk mitigation that reduces the impact of development downstream, such as sustainable drainage systems and wetland creation. Mitigation is also provided through Policy DM SE8: Managing flood risk in the Local Plan. These flood mitigation measures are expected to enhance water quality, with a minor positive effect also expected in relation to **IIA18: Water**.

5.89 Negligible effects are expected in relation to IIA3: Housing, IIA7: Crime and community safety and IIA10: Town and local centres.

Crews Hill

Table 5.9: IIA findings for Policy SP PL9: Crews Hill

IIA objective	SP PL9: Crews Hill
IIA1: Climate change mitigation	++/--
IIA2: Climate change adaptation	+
IIA3: Housing	++
IIA4: Health and wellbeing	++/-
IIA5: Services and facilities	++
IIA6: Social inclusion	+
IIA7: Crime and community safety	0
IIA8: Road safety	+
IIA9: Economy	++
IIA10: Town and local centres	0
IIA11: Air pollution	--/+
IIA12: Sustainable transport	++/--
IIA13: Biodiversity	+/-
IIA14: Historic environment	+?/-?
IIA15: Landscape and townscape	++?
IIA16: Efficient use of land and materials	+/-?
IIA17: Flooding	+/-
IIA18: Water	+

5.90 Policy SP PL9: Crews Hill supports residential-led redevelopment of Crews Hill, which will become a gateway to north Enfield's part of London's 'National Park City'. The policy includes one large housing allocation, one industrial allocation and land that has not been allocated but which will deliver more development beyond the end of the Plan period, i.e. 2039. Policy SP PL9 supports development that provides opportunities for convenient and safe active travel, stating that cycle and pedestrian priority streets and routes should permeate all development areas. A high quality public realm is also supported, in addition to green links to surrounding areas, which will include walking and cycling routes. The policy also requires the improvement of existing east-west links and opportunities to create and make viable new links across the railway line, as well as additional stopping train services at Crews Hill railway station. Providing a mix of uses within the one area will also reduce the need for people to travel elsewhere, via private car, to reach certain amenities. All of these measures will help minimise CO₂ emissions associated with use of the private car. However, Policy SP PL9 states that development will need to address limitations in the capacity of the existing road network, particularly in accessing land to the west of the railway and including the road passing under the railway near Crews Hill station. Increasing the capacity of the road network would accommodate a higher number of car trips with associated CO₂ emissions. The policy also requires development proposals to facilitate a shift towards a net zero carbon future and requires new homes and facilities to be connected to the Energetik heat network, which would help to minimise CO₂ emissions. Therefore, overall, a mixed significant positive and significant negative effect is expected in relation to

IIA1: Climate change mitigation. Policy SP PL9 is expected to have a minor positive effect in relation to **IIA2: Climate change adaptation** because it requires development and associated green infrastructure to contribute to the delivery of strategic flood mitigation.

5.91 A significant positive effect is expected in relation to **IIA3: Housing** because the housing allocation within the Crews Hill placemaking area supports the development of 3,000 new housing units and will therefore contribute significantly to housing need. According to the policy, development should provide a mix of housing sizes, types and tenures. Policy SP PL9 states that development at Crews Hill should deliver a variety of facilities and services suitable to the scale of new community to meet the day to day needs of its residents and is therefore likely to include healthcare provision although this is not specified. At present, the Crews Hill area does not contain a GP surgery and is located over 800m from the nearest GP surgery. The Crews Hill placemaking area is located within close proximity of areas of open space and Policy SP PL9 requires development to incorporate a variety of typologies of open space. According to the vision for the placemaking area, access will be provided to rewilded landscapes, in addition to sports and recreation spaces, and Crews Hill will offer a healthy and inclusive environment supported by access to green space. As set out in the policy itself, covered public spaces, winter gardens and glass house spaces for every home will potentially be provided, which will help address existing deficiencies in access to open space, in addition to contributing towards people's health and wellbeing. Residents are also encouraged to produce or buy food locally, which is expected to increase awareness of healthy eating. With respect to amenity, the policy requires noise mitigation from the M25 for development to the north of the Crews Hill area. According to the policy, the design of all residential properties should mitigate the blight of motorway noise in their layout, design and location of outside space. Overall, a mixed significant positive and minor negative effect is expected in relation to **IIA4: Health and wellbeing**.

5.92 Policy SP PL9 is expected to have a significant positive effect in relation to **IIA5: Services and facilities** because the policy supports mixed-use development and includes provision of education facilities. The policy also supports upskilling and sharing specialist skills and knowledge in horticulture, land sciences, food production and the arts associated with food and the culture of food. According to the vision for the area, residents will contribute a range of skills, whilst also benefitting from education, training and employment opportunities close to home.

5.93 This placemaking area is not located within one of the 20% most deprived areas within England but Policy SP PL9 supports the development of a mixed and inclusive community by providing a diversity of employment opportunities, housing sizes, types and tenures, in addition to affordable housing. The policy also requires a sustainable form of development where new residents are within easy reach of, and connected to, the railway station and existing proposed green and blue infrastructure networks. This will ensure that those who may not have access to a car still have access to the rest of the Borough through public transport, in addition to walking and cycling routes. According to Policy SP PL9, development at Crews Hill should improve the functionality and connectivity of the east-west green corridors across the north of the Borough in order to minimise the reliance of development on vehicular access. Therefore, a minor positive effect is expected in relation to **IIA6: Social inclusion**. A minor positive effect is also expected in relation to **IIA8: Road safety** because development is required to provide safe cycle and pedestrian priority routes.

5.94 Policy SP PL9 is expected to have a significant positive effect in relation to **IIA9: Economy** because although Crews Hill is not located adjacent or close to a Strategic Industrial Locally or a Locally Significant Industrial Site, the placemaking area includes an industrial allocation and the policy supports the provision of a diversity of employment opportunities. As already noted, the policy promotes upskilling and developing specialist skills and knowledge in horticulture, land sciences, food production and the arts associated with food and the culture of food and growing. Further to this, it supports the retention of rural uses such as equestrian and horticultural uses. Therefore, it would help support the rural economy. As set out in the vision, Crews Hill will become an important gateway to the London 'National Park City' and it is therefore also expected to support the tourism industry.

5.95 A mixed significant negative and minor positive effect is expected in relation to **IIA11: Air pollution** because although Crews Hill contains a railway station and the policy supports the provision of walking and cycling routes, it seeks to increase the capacity of the road network to accommodate a higher number of car trips, which would contribute towards air pollution. However, mitigation is provided through Policies SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice within the Local Plan, and the two site allocations within the placemaking area scored 1 rather than 2 in the air quality appraisal, which is poor but not as poor as other allocations within the Local Plan. The air quality appraisal gave consideration to the estimated housing capacity of each of the allocations and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of each site.

5.96 Policy SP PL9 is expected to have a mixed significant positive and significant negative effect in relation to **IIA12: Sustainable transport** because it supports development that provides opportunities for convenient and safe active travel, stating that cycle and pedestrian priority streets and routes should permeate all development areas. A high quality public realm is also supported, in addition to green links to surrounding areas, which will include walking and cycling routes. The policy seeks to strengthen cycle routes, with specific reference given to National Cycle Network Route 12. Providing a mix of uses within one area is also likely to minimise the need to travel elsewhere via car in order to reach certain amenities. However, as stated above, the policy supports an increase in the capacity of the road network so will accommodate a higher number of car trips.

5.97 The Crews Hill placemaking area partially overlaps Crews Hill to Bowes Park Railsides SINC, Crews Hill Golf Course SINC, Whitewebbs Wood SINC and Ancient Woodland, and Hilly Fields Country Park SINC, in addition to containing a large number of Priority Habitats. However, mitigation for potential adverse effects on biodiversity is provided through Local Plan Policy SP BG2: Protecting nature conservation sites. Policy SP PL9 seeks to improve the east-west green corridors across the north of the Borough and to incorporate a high quality public realm, as well as green links to the surrounding designated landscapes, such as Enfield Chase, with beneficial effects on biodiversity. The policy also supports horticultural and food growing land uses and the retention of existing rural uses, which is expected to increase biodiversity. Support is also given for the establishment of a functional flood plain, and diversity of habitats along the Salmon, Turkey and Cuffley Brooks, as well as along other smaller watercourses and in other green spaces in the area, which is expected to increase the ecological potential of the area. Therefore, overall, Policy SP PL9 is expected to have a mixed minor positive and minor negative effect in relation to **IIA13: Biodiversity**.

5.98 Crews Hill placemaking area contains one Grade II* listed building (The Paddocks) and three Grade II listed buildings (Owls Hall, Glasgow Stud Farmhouse and 2 Barns North West of Farmhouse at The Paddocks), in addition to abutting Clay Hill Conservation Area. The area also contains an Archaeological Priority Area (APA3: Whitewebbs Hill, Bulls Cross and Forty Hill). Although specific reference is not made to the historic environment within Policy SP PL9, there is a requirement for development within Crews Hill to respond to the surrounding landscape character, including that of the Theobalds Estate South Area of Special Character. Development is required to improve visual links to the restored and rewilded Enfield Chase landscape to the west and the National Park City to the north west. Land to the south of the Crews Hill built up area can support horticultural and food producing land uses and reinforce the separation of development from Gordon Hill to the south. To the east, development form and scale should respect the sensitive and more intimate nature of the landscape of Whitewebbs. According to the policy, development at Crews Hill should build on the area's existing identity, separated from other built forms in the north of the Borough by its topography, access and surrounding landscape character. The policy also makes provision for different open space typologies and enhancements to the public realm. Mitigation is also offered in the form of Policy SP DE4: Putting heritage at the centre of placemaking. Further to this, Appendix B in the Local Plan requires a Heritage Impact Assessment to be undertaken for one of the allocations within the placemaking area and mitigation provided. Therefore, overall, a mixed minor positive and minor negative effect is expected in relation to **IIA14: Historic environment**, whilst a significant positive effect is expected in relation to **IIA15: Landscape and townscape**. Both effects are recorded as uncertain because the actual effects will depend on the final design, scale and layout of development.

5.99 A mixed minor positive and minor negative effect is expected in relation to **IIA16: Efficient use of land and materials** because although parts of the placemaking area comprise brownfield land, others comprise greenfield land that is classed as Grade 3 agricultural land. The negative effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is classed as high quality, while Grade 3b is not).

5.100 A mixed minor positive and minor negative effect is expected in relation to **IIA17: Flooding** because although the two allocations within this placemaking area do not fall within Flood Zones 2 or 3, they are at risk of surface water flooding, with a predicted peak flood depth of greater than 300mm. However, the policy requires development and associated green infrastructure to contribute towards the delivery of strategic flood mitigation, contributing to the performance of downstream locations across the Borough. New development should be designed to have the capacity and means of retaining storm runoff which would otherwise be dealt with at on-site locations downstream in more constrained urban infill locations. Further to this, flood risk mitigation will be provided through Local Plan Policy DM SE8: Managing flood risk. A minor positive effect is also expected in relation to **IIA18: Water** because the policy supports the establishment of a functional floodplain and diversity of habitats along the Salmon, Turkey and Cuffley Brooks, as well as other smaller watercourses and in other green spaces, to increase the ecological potential of the area which would have the effect of improving overall water quality.

5.101 Negligible effects are expected in relation to IIA7: Crime and community safety and IIA10: Town and local centres.

Chase Park

Table 5.10: IIA findings for Policy SP PL10: Chase Park

IIA objective	SP PL10: Chase Park
IIA1: Climate change mitigation	++/-
IIA2: Climate change adaptation	+
IIA3: Housing	++
IIA4: Health and wellbeing	++
IIA5: Services and facilities	++
IIA6: Social inclusion	+
IIA7: Crime and community safety	+
IIA8: Road safety	+
IIA9: Economy	++
IIA10: Town and local centres	++
IIA11: Air pollution	--/+
IIA12: Sustainable transport	++
IIA13: Biodiversity	+/-
IIA14: Historic environment	+?/-?
IIA15: Landscape and townscape	+?
IIA16: Efficient use of land and materials	--?
IIA17: Flooding	+/-
IIA18: Water	+/-

5.102 Policy SP PL10: Chase Park supports the development of a high quality new neighbourhood, providing a mixture of homes and good links to employment opportunities. The policy includes two housing allocations and land that has not been allocated but which will deliver more development beyond 2039. Policy SP PL10 requires development to maximise opportunities for sustainable and active travel. According to the policy, the design, form and layout of transport infrastructure must create a place where walking, cycling and use of public transport is the natural choice. Although the placemaking area does not contain a railway station, it is within 1km of Oakwood tube station and adjacent to a number of bus stops. Development is also required to provide new green links to facilitate movement between the existing and new communities, and to Trent Park as a publicly accessible landscape. The policy states that development should close the gap in the missing link between Enfield Chase landscape and its namesake station. Sustainable and active travel routes are also encouraged, to provide easy access to existing local centres at Oakwood and Enfield Chase, the major centre at Enfield Town and the major employer at Chase Farm Hospital. Improvements are expected to be made to the existing footways along the A10, in order to create an attractive environment for walking, cycling and other non-polluting wheeled transport. However, the development of a mix of uses within Chase Park is expected to draw more residents and visitors into the area, which is likely to result in an increase in cars on the road and associated CO₂ emissions. Therefore, overall, a mixed significant positive and minor negative effect is expected in

relation to **IIA1: Climate change mitigation**. Policy SP PL10 supports the integration of sustainable drainage systems into the public realm and is therefore expected to have a minor positive effect in relation to **IIA2: Climate change adaptation**.

5.103 Policy SP PL10 is expected to have a significant positive effect in relation to **IIA3: Housing** because the mixed-use allocation contained within the placemaking area has capacity to accommodate 3,000 new housing units. According to the policy, a mix of dwelling sizes, types and tenures of new homes will be supported, with affordable homes also provided as a proportion of overall housing delivery. Provision is also made for Specialist Housing for Older People along the A110 Enfield Road corridor, alongside improvements to existing footways along the road. Significant positive effects are also expected in relation to **IIA4: Health and wellbeing** and **IIA5: Services and facilities** because the Chase Park placemaking area is within 800m of both a primary school and a secondary school and is also within 800m of a number of areas of open space, as well as 400m of a GP surgery. The policy states that social and physical infrastructure such as community centres, shops, health and education facilities will be provided to support the day-to-day needs of residents. Additionally, provision will be made for high quality play spaces at a variety of scales and sizes, with doorstep play within individual development parcels also supported. This will help narrow address any deficiencies in access to open space within the area.

5.104 Although the Chase Park placemaking area is not located within one of the 20% most deprived areas in England, it supports the creation of an inclusive community and the delivery of a mix of dwellings sizes, tenures and types (including a proportion of affordable housing) to support people through all stages of life. For example, it supports Specialist Housing for Older People along the A110 Enfield Road corridor and states that improvements to existing footways along the road will be required, in order to create an attractive environment for walking, cycling and other active travel modes. Support for more active and sustainable modes of transport is also expected to benefit any residents who may not have access to a car. Provision is also made for healthcare facilities and open space, which will help narrow any gaps in access to healthcare and open space within Chase Park. There is also a requirement within the policy for the design and layout of the public realm, community spaces, buildings and facilities to create opportunities for people to interact with their neighbours, which will have beneficial effects on social cohesion. Therefore, overall, a minor positive effect is expected in relation to **IIA6: Social inclusion**. A minor positive effect is also expected in relation to **IIA8: Road safety** because there is a requirement under Policy SP PL10 to close the missing link in National Cycle Network route 12, which is likely to improve safety for cyclists who may otherwise have had to divert their route and travel along busy roads. The policy also supports improvements to existing footways along the A1110 and although it does not specify what improvements would be made, is expected to increase safety for pedestrians.

5.105 According to the vision for the Chase Park placemaking area, provision of doorstep workspaces and links to existing employers such as Chase Farm hospital to the north will provide employment opportunities for new and existing residents. The supporting text identifies Chase Farm Hospital as a major employment location within the area and according to Policy SP PL10, high density residential development will be located close to Chase Farm Hospital so as to provide accommodation for workers. According to the policy, the range of employment opportunities within easy reach of Chase Park provides an opportunity for it to be developed as an exemplar scheme of a place that facilitates a sustainable lifestyle. Therefore, a significant positive effect is expected in relation to **IIA9: Economy**. A significant positive effect is also expected in relation to **IIA10: Town and local centres** because Policy SP PL10 supports the delivery of sustainable and active travel routes to existing local centres at Oakwood and Enfield Chase, the major centre at Enfield Town and the major employer at Chase Farm Hospital. This is expected to increase footfall within these centres, with associated benefits on the economy.

5.106 Chase Park is located within close proximity to a railway station and a number of bus stops, which could reduce reliance on the private car and help minimise associated air pollution. Indeed, the policy seeks to make walking, cycling and the use of public transport the natural choice. Likewise, Policies SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice in the Local Plan also support more active and sustainable travel choices. However, the mixed-use development at Chase Park may draw more resident into the area, which could increase the number of cars on the road with adverse effects on air quality. The two allocations within the Chase Park placemaking area scored 1 rather than 2 in the air quality appraisal, which is poor but not as poor as other allocations within the Local Plan. The air quality appraisal gave consideration to the estimated housing capacity of the allocation and proximity to Air Quality Focus Areas (AQFAs), in order to determine the potential future impact on the air quality of the site. Therefore, Policy SP PL10 is expected to have a mixed significant negative and minor positive effect in relation to **IIA11: Air pollution**.

5.107 Policy SP PL10 is expected to have a significant positive effect in relation to **IIA12: Sustainable transport** because it requires development to maximise opportunities for sustainable and active travel. According to the policy, the design, form and layout of transport infrastructure must create a place where walking, cycling and use of public transport is the natural choice. Although the placemaking area does not contain a railway station, it is within 1km of Oakwood tube station and adjacent to a

number of bus stops. Development is also required to provide new green links to facilitate movement between the existing and new communities, and to Trent Park as a publicly accessible landscape. Providing a mix of uses within one area is also likely to minimise the need to travel elsewhere via car in order to reach certain amenities.

5.108 Chase Park placemaking area contains some Priority Habitats (deciduous woodland) and is located adjacent to Trent Park SINC, Trent Park Golf Course SINC, Lakeside SINC and Boxer's Lane & Lonsdale Drive Woods SINC. The area is also located within 250m of Crews Hill to Bowes Park RAILSIDES. However, mitigation is provided in the form of Policy SP BG2: Protecting nature conservation sites in the Local Plan. The placemaking policy itself requires development to provide new green links and facilitate the rewilding at Enfield Chase, in addition to the naturalisation and restoration of the river corridor along Salmons Brook, through wetland creation and flood risk alleviation to enhance the ecological potential of the area. Biophilic principles should be incorporated where possible to maximise urban greening and integration with blue and green networks. The development must include greening elements on buildings, gardens, in streets in public open space and through the materials used. Sustainable urban drainage systems should also be integrated into the public realm and designed to be multi-functional. Therefore, overall, Policy SP PL10 is expected to have a mixed minor positive and minor negative effect in relation to **IIA13: Biodiversity**.

5.109 Chase Park placemaking area partially falls within Trent Park Conservation Area, which contains a number of Grade II listed buildings and the Trent Park Registered Park and Garden. The placemaking area is also located within 500m of Highlands Conservation Area, Clay Hill Conservation Area and some Grade II* and Grade II listed buildings, in addition to the setting of an Archaeological Priority Area (APA2: Enfield Chase and Camlet Moat). Policy SP PL10 requires development to front onto the open space of Trent Park to the west, creating a positive and sensitive relationship with the historic landscape. The design of new development is also required to acknowledge the townscape, which comprises 1930s residential dwellings. Mitigation of the historic environment is also provided through Policy SP DE4: Putting heritage at the centre of placemaking in the Local Plan. Further to this, Appendix B in the Local Plan requires a Heritage Impact Assessment to be undertaken for one of the allocations within the placemaking area and mitigation provided. Therefore, a mixed minor positive and minor negative effect is expected in relation to **IIA14: Historic environment**. With regard to the landscape, Policy SP PL10 requires development to front onto the Green Belt and have a positive relationship with the wider landscape, including the restored Enfield Chase and the London 'National Park City' in north west Enfield. Development is required to have a distinctive character, delivered at all scales of design, for example through its layout, form, range of building typologies, materials, landscape design and green infrastructure. Development along the eastern and western edges of the development must positively respond to the landscape and watercourses which form the edge of the placemaking area, while development along the southern edge of the area which abuts existing residential areas will need to carefully mediate the change in density between the existing 1930s suburban housing and the new higher density development within Chase Park. For these reasons outlined above, a minor positive effect is expected in relation to **IIA15: Landscape and townscape**. The effects against both objectives are recorded as uncertain because the actual effects will depend on the final design, scale and layout of development.

5.110 The policy is expected to have a significant negative effect in relation to **IIA16: Efficient use of land and materials** because the placemaking area mainly comprises greenfield land classed as Grade 3 agricultural land. The effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is classed as high quality, while Grade 3b is not).

5.111 Chase Park contains a small proportion of land that falls within Flood Zone 3 and both of the allocated sites within this placemaking area are at risk of surface water flooding, with a predicted peak flood depth of greater than 300m. However, Policy SP PL10 supports the integration of sustainable urban drainage systems into the public realm and the naturalisation and restoration of the river corridor along Salmons Brook in particular, through wetland creation and flood risk alleviation but which will also enhance the ecological potential of the area. Mitigation is also provided in the form of Local Plan Policy DM SE8: Managing flood risk. Therefore, a mixed minor positive and minor negative effect is expected in relation to **IIA17: Flooding**. The placemaking area contains a number of brooks, including Merryhills, but does not fall within a Source Protection Zone. The policy seeks to enhance the ecological potential of the watercourses in the area, which is likely to improve water quality. Therefore, a mixed minor positive and minor negative effect is expected against **IIA18: Water**.

Chapter 6

IIA findings for the policies in Chapters 4-15 of the Enfield Local Plan

6.1 This chapter presents the IIA findings for the strategic and development management policies in the Local Plan. Overall, there are 36 strategic policies (including 10 place policies) and 57 development management policies across the following topics:

- Good growth in Enfield (appraised in **Chapter 4** of this IIA Report);
- Places (appraised in **Chapter 5** of this IIA Report);
- Sustainable Enfield;
- Addressing equality and improving health and wellbeing;
- Blue and green Enfield;
- Design and character;
- Homes for all;
- Economy;
- Town centres and high streets;
- Rural Enfield;
- Culture, leisure and recreation;
- Movement and Connectivity;
- Environmental protection; and
- Delivering and monitoring.

6.2 A summary table illustrating the likely sustainability effects of all policies within each Local Plan chapter (4 to 15) is provided, using the symbols and colour coding described in **Figure 2.2**. The effects of all the Local Plan policies alongside each other can be seen in **Table 7.1** at the start of the Cumulative Effects chapter in **Chapter 7**. As noted in **Chapter 2**, negligible effects are recorded where a policy or site allocation is considered to have no effect in contributing to achievement of the IIA objective. For the policies, this is usually the case when the policy makes no explicit reference to what the IIA objective is seeking to achieve and/or because of the narrow focus of what each policy covers (in particular the DM policies). However, it is usually the case that another policy or policies within the Local Plan directly seek to address that IIA objective and this is covered in Chapter 7 through the consideration of the effects of the whole plan together.

4. Sustainable Enfield

6.3 The likely sustainability effects of the Sustainable Enfield policies in Chapter 4 of the Enfield Local Plan are set out in **Table 6.1** and described below the table.

Table 6.1: IIA findings for the sustainable Enfield policies

IIA objective	SP SE1: Responding to the climate emergency	DM SE2: Sustainable design and construction	DM SE3: Whole-life carbon and circular economy	DM SE4: Reducing energy demand	DM SE5: Greenhouse gas emissions and low carbon energy supply	DM SE6: Renewable energy development	DM SE7: Climate change adaptation and managing heat risk	DM SE8: Managing flood risk	DM SE9: Protection and improvement of watercourses	DM SE10: Sustainable drainage systems
IIA1: Climate change mitigation	++	++	+	++	++	++	0	0	0	0
IIA2: Climate change adaptation	++	+	0	0	0	0	++	+	+	+
IIA3: Housing	0	0	0	0	0	0	0	0	0	0
IIA4: Health and wellbeing	0	0	0	0	0	+	+	+	0	+
IIA5: Services and facilities	0	0	0	0	0	0	0	0	0	0
IIA6: Social inclusion	0	0	0	0	0	0	0	0	0	0
IIA7: Crime and community safety	0	0	0	0	0	0	0	+	0	0
IIA8: Road safety	0	0	0	0	0	0	0	0	0	0
IIA9: Economy	0	0	0	0	0	0	0	0	0	0
IIA10: Town and local centres	0	0	0	0	0	0	0	0	0	0
IIA11: Air pollution	+	0	0	0	+	0	0	0	0	0
IIA12: Sustainable transport	0	0	0	0	0	0	0	0	0	0
IIA13: Biodiversity	0	0	0	0	0	0	+	+	+	+
IIA14: Historic environment	0	0	0	0	0	+	0	0	0	0
IIA15: Landscape and townscape	0	0	0	0	0	+	+	0	0	0
IIA16: Efficient use of land and materials	+	0	++	0	0	+	0	+	0	0
IIA17: Flooding	+	0	0	0	0	0	0	++	+	++
IIA18: Water	+	0	+	0	0	0	0	+	++	+

6.4 Policy SP SE1: Responding to the climate emergency sets out the Council's approach to tackling climate change and meeting the 2040 net zero carbon target set out in the Climate Action Plan, whilst Policies DM SE4: Reducing energy demand, DM SE5: Greenhouse gas emissions and low carbon energy supply and DM SE6: Renewable energy development outline in detail measures that will be taken to minimise greenhouse gas emissions. Policy DM SE4 contains targets for heating and energy use with reference made to a Passivhaus equivalent certification, while Policy DM SE5 requires provision of an Energy Statement setting out how emissions savings have been maximised and carbon reduced, in addition to a requirement for major developments to be net-zero carbon. The policy also supports the installation of low carbon heating and hot water, no onsite combustion of fossil fuels and connecting developments to decentralised energy networks. Policy DM SE6 promotes development that incorporates renewable and low carbon energy. Therefore, all four policies are expected to have significant

positive effects in relation to **IIA1: Climate change mitigation**. Policy DM SE2 seeks to ensure that the design and construction of development is sustainable through the submission of a Sustainable Design and Construction Statement, in addition to working towards achieving the Home Quality Mark 4.5* with a minimum certification level of 4* for residential development and BREEAM 'Outstanding' with a minimum certification level of 'Excellent' for non-residential development. Therefore, Policy DM SE2 is expected to have a significant positive effect in relation to IIA1. Policy DM SE3 requires the submission of a Circular Economy Statement, which sets out how circular economy principles have been taken into consideration. Therefore, it is expected to have a minor positive effect in relation to this objective.

6.5 A number of these policies specifically aim to ensure that the Borough is resilient to the effects of climate change. Policy SP SE1: Responding to the climate emergency seeks to reduce flood risk (SuDS) and promote sustainable infrastructure, while Policy DM SE7: Climate change adaptation and managing heat risk will seek to avoid exacerbation of the urban heat island effect, which has been identified as a key sustainability issue in the Borough and will require development to provide adequate mitigation measures to minimise the risk of overheating, taking into account future climate change. As such, these policies will encourage development proposals to incorporate sustainable design and construction techniques which are likely to ensure that development within Enfield is resilient to the effects of climate change and so are expected to have significant positive effects against **IIA2: Climate change adaptation**. Policies DM SE8: Managing flood risk, DM SE9: Protection and improvement of watercourses and DM SE10: Sustainable drainage systems will seek to reduce flood risk and alleviate the effects of flooding. In addition, Policy DM SE2: Sustainable design and construction states that it will require a Sustainable Design and Construction Statement with development proposals, which sets out how sustainable design principles have been integrated into the construction and operational phases of the development. Therefore, these policies will also contribute towards building a Borough that is resilient to climate change. As such, minor positive effects are expected against IIA2 in relation to these policies.

6.6 Policy DM SE6: Renewable energy development supports development involving renewable and low carbon energy where it protects local amenity and includes appropriate stand-off distances between technologies (e.g. wind turbines) and sensitive uses, whilst Policy DM SE10: Sustainable drainage systems states that measures should be incorporated to maximise opportunities to improve recreation value, and is therefore likely to provide opportunities for, and improve access to, recreation for the resident population. It also makes reference to improving local amenity and will therefore benefit communities within the Borough. Therefore, both policies are expected to have minor positive effects in relation to **IIA4: Health and wellbeing**. A minor positive effect is also expected for Policy DM SE7: Climate change adaptation in relation to this objective because the policy seeks to avoid exacerbation of the urban heat island effect, improve micro-climate conditions and provide thermally comfortable environments, in addition to minimising overheating through landscaping, tree planting and the use of blue and green infrastructure. Policy DM SE8: Managing flood risk is also expected to have beneficial effects on people's mental wellbeing by avoiding and reducing the risk of flooding. The policy states that all new developments at risk of flooding must demonstrate they will be safe throughout their lifetime, taking into account the vulnerability of their users, which includes the provision of flood warning arrangements and evacuation plans.

6.7 Policy DM SE8: Managing flood risk is expected to have a minor positive effect in relation to **IIA7: Crime and community safety** because it requires all new development at risk of flooding to demonstrate that it will be safe throughout its lifetime, taking into account the vulnerability of its users, which includes the provision of flood warning arrangements and evacuation plans.

6.8 Policy SP SE1: Responding to the climate emergency states that the Council will work with partners to use all planning tools available to meet the 2040 net zero carbon Borough commitments. Reducing carbon emissions is likely to have beneficial effects on air quality and therefore a minor positive effect is expected in relation to **IIA11: Air pollution**. Policy DM SE5: Greenhouse gas emissions and low carbon energy supply is expected to have a minor positive effect in relation to this objective because it states that no onsite combustion of fossil fuels should take place, which would help minimise air pollution.

6.9 Policy DM SE7: Climate change adaptation and managing heat risk includes measures such as landscaping, tree planting and the use of blue-green infrastructure in order to mitigate the urban heat island effect, whilst Policy DM SE10: Sustainable drainage systems requires that developments include measures to maximise opportunities to improve biodiversity. Similarly, Policies DM SE8: Managing flood risk and DM SE9: Protection and improvement of watercourses require development in proximity to watercourses to have an adequate set back with a means to facilitate river naturalisation, ecological enhancements and de-culverting, which improves the ecological function of river corridors. These policies are therefore likely to contribute towards biodiversity enhancement and so will result in minor positive effects against **IIA13: Biodiversity**.

6.10 Policy DM SE6: Renewable energy development states that the Council will support development involving renewable and low carbon energy that has regard to sensitive receptors, including high quality landscapes such as river valleys, reservoirs and regional parks, parts of the urban fringe, areas of special character and areas of Metropolitan Open Land. Therefore, as well as protecting the landscape, this policy could also help protect the historic environment. As such, minor positive effects are expected in relation to **IIA14: Historic environment** and **IIA15: Landscape and townscape** in relation to this policy. Policy DM SE7: Climate change adaptation and managing heat risk is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape** because it supports landscaping and tree planting, which is expected to benefit the appearance and character of the area.

6.11 Policies SP SE1: Responding to the climate emergency and DM SE3: Whole-life carbon and circular economy will seek to minimise the production of waste, promote the use of sustainable materials and ensure that new development applies circular economy principles to the reuse of building components, energy, water and waste infrastructure. Policy DM SE3 specifically prioritises the reuse and retrofitting of existing buildings. In addition, Policy DM SE6: Renewable energy development will seek to enable the reuse and regeneration of land in the Borough. Overall, therefore, Policy DM SE3 is expected to have a significant positive effect in relation to **IIA16: Efficient use of land and materials**, whilst Policies SP SE1 and DM SE6 are expected to have minor positive effects in relation to this objective. Policy DM SE8: Managing flood risk is also expected to have a minor positive effect in relation to this objective because it supports development on previously developed land.

6.12 Policy DM SE8: Managing flood risk seeks to ensure that new development includes measures to avoid and reduce the risk of flooding, as well as not increasing flood risk elsewhere, while Policy DM SE10: Sustainable drainage systems will contribute to reducing flood risk in the Borough through the use of Sustainable Drainage Systems (SuDS). Therefore, significant positive effects are expected against **IIA17: Flooding** in relation to these policies. Policy SP SE1: Responding to the climate emergency will also seek to ensure that development incorporates SuDS and is therefore expected to have a minor positive effect against IIA17. Policy SP SE1 also seeks to improve wastewater infrastructure in line with the Council's Infrastructure Delivery Plan. Policies DM SE8 and DM SE10 will help development to manage surface water and reduce runoff using sustainable drainage systems and preventing the loss of permeable surfaces. These policies are therefore also likely to protect surface water quality, with minor positive effects expected against **IIA18: Water**. Policy DM SE9: Protection and improvement of watercourses seeks to ensure that development proposals enhance the flood risk and water quality aesthetic and amenity quality of nearby watercourses and prevent any deterioration in a watercourse, as well as prevent development on any land required for current and future flood management which would adversely affect the delivery of flood defence schemes. As such, this policy will contribute towards the prevention of water pollution and protect water quality in the Borough, and so is expected to have a significant positive effect against IIA18 and a minor positive effect against IIA17. A minor positive effect is expected for Policy DM SE3: Whole-life carbon and circular economy in relation to **IIA18: Water** because it requires all major development proposals to demonstrate how circular economy principles have informed the design and implementation of water and waste infrastructure and is therefore likely to help manage water resources efficiently, at the same time as protecting water quality.

6.13 Negligible effects are expected in relation to IIA3: Housing, IIA5: Services and facilities, IIA6: Social inclusion, IIA8: Road safety, IIA9: Economy, IIA10: Town and local centres and IIA12: Sustainable transport.

5. Addressing equality and improving health and wellbeing

6.14 The likely sustainability effects of the addressing equality and improving health and wellbeing policies in Chapter 5 of the Enfield Local Plan are set out in **Table 6.2** and described below the table.

Table 6.2: IIA findings for the addressing equality and improving health and wellbeing policies

IIA objective	SP SC1: Improving health and wellbeing of Enfield's diverse communities	SP SC2: Protecting and enhancing social and community infrastructure
IIA1: Climate change mitigation	+	+
IIA2: Climate change adaptation	0	0
IIA3: Housing	0	+
IIA4: Health and wellbeing	++	+
IIA5: Services and facilities	++	++
IIA6: Social inclusion	++	++
IIA7: Crime and community safety	0	+
IIA8: Road safety	+	0
IIA9: Economy	0	+
IIA10: Town and local centres	0	+
IIA11: Air pollution	+	+
IIA12: Sustainable transport	+	+
IIA13: Biodiversity	++	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	0	0
IIA16: Efficient use of land and materials	0	0
IIA17: Flooding	0	0
IIA18: Water	0	0

6.15 Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is expected to have a minor positive effect in relation to **IIA1: Climate change mitigation** because it states that development proposals will be expected to make provision for sustainable modes of travel, including safe cycling routes, attractive walking routes and easy access to public transport. This would reduce reliance on the private car and minimise CO₂ emissions. The policy also supports the provision of green infrastructure, which will help absorb CO₂ emissions. Policy SP SC2: Protecting and enhancing social and community infrastructure is also expected to have a minor positive effect in relation to this objective because it states that new or improved community facilities should be located within the Borough's designated town centres, where a number of services and facilities

are within walking distance of one another. This policy is therefore expected to promote more active and sustainable travel choices.

6.16 SP SC2: Protecting and enhancing social and community infrastructure is expected to have a minor positive effect in relation to **IIA3: Housing** because it seeks to avoid the loss of housing floorspace. Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is expected to have a significant positive effect in relation to **IIA4: Health and wellbeing** because it requires development proposals to demonstrate how they will improve the health and well-being of the Borough through the submission of a Health Impact Assessment. The policy states that development proposals must contribute to healthy and active lifestyles, whilst also seeking to improve access to local healthy food opportunities, allotments and food growing spaces. Further to this, the policy promotes leisure, recreation and play facilities to encourage physical activity. Policy SP SC2 is also expected to have a significant positive effect in relation to this objective because it promotes the development of social and community facilities in town centres or walking distance of public transport, pedestrian and cycling routes. Therefore, it will encourage more walking and cycling, with beneficial effects on people's health. It also states that contributions will be sought towards additional health and social care facilities, taking account of the latest strategic health needs assessment, pharmaceutical assessment and relevant NHS estate strategies.

6.17 Policies SP SC1: Improving health and wellbeing of Enfield's diverse communities and SP SC2: Protecting and enhancing social and community infrastructure are expected to have significant positive effects in relation to **IIA5: Services and facilities** because they make provision for social and community infrastructure, including the development of education, health, leisure and community facilities. Policy SP SC2 specifically states that contributions will be sought towards new school places to meet the needs arising from new housing development, taking account of available capacity within existing schools and the number of pupils it will generate.

6.18 Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is also expected to have a significant positive effect in relation to **IIA6: Social Inclusion** because it requires developments to have an inclusive layout with a public realm that considers the needs of all, including the older population and disabled people. A significant positive effect is also expected for Policy SP SC2: Protecting and enhancing social and community infrastructure as it requires community infrastructure to be welcoming, safe, affordable and inclusive. With respect to education provision, the policy states that new or expanded schools will be expected to incorporate specialist provision where demand exists and make reasonable adjustments to support the needs of the disabled and mobility impaired.

6.19 Policy SP SC2: Protecting and enhancing social and community infrastructure is expected to have a minor positive effect in relation to **IIA7: Crime and community** because it promotes the increased provision of community infrastructure, which may help reduce crime levels, in addition to requiring a strong active frontage which will enable passive surveillance. Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is expected to have a minor positive effect in relation to **IIA8: Road Safety** because it promotes safe cycle routes.

6.20 Policy SP SC2: Protecting and enhancing social and community infrastructure is expected to have a minor positive effect in relation to **IIA9: Economy** because it seeks to avoid the loss of employment floorspace. The policy is also expected to have a minor positive effect in relation to **IIA10: Town and local centres** because it requires new or improved community facilities to be located within or adjacent to the Borough's designated town centres, which will increase footfall within the town centres and enhance their vitality.

6.21 Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is expected to have a minor positive effect in relation to **IIA12: Sustainable transport** because it promotes access to sustainable modes of travel, including safe cycling routes, attractive walking routes and easy access to public transport. A minor positive effect is also expected for Policy SP SC2: Protecting and enhancing social and community infrastructure as it states that community centres must be within walking distance of public transport, pedestrian and cycling routes. For this reason, a minor positive effect is also expected for both policies in relation to **IIA11: Air pollution** as they both promote sustainable transport options which will contribute to reducing air pollution associated with use of the private car.

6.22 Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities is expected to have a minor positive effect in relation to **IIA13: Biodiversity** because it promotes access to green infrastructure, including blue corridors and open spaces within the Borough.

6.23 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA14: Historic environment, IIA15: Landscape and townscape, IIA16: Efficient use of land and materials, IIA17: Flooding and IIA18: Water.

6. Blue and green Enfield

6.24 The likely sustainability effects of the blue and green Enfield policies in Chapter 6 of the Enfield Local Plan are set out in **Table 6.3** and described below the table.

Table 6.3: IIA findings for the blue and green Enfield policies

IIA objective	SP BG1: Enfield's blue and green infrastructure network	SP BG2: Protecting nature conservation sites	SP BG3: Biodiversity net gain, rewilding and offsetting	SP BG4: Green Belt and Metropolitan Open Land	SP BG5: Green Belt and edges of the countryside/urban areas	DM BG6: Protecting open space	DM BG7: Watercourses	DM BG8: Urban greening and biophilic principles	DM BG9: Allotments and community food production	DM BG10: Burial and crematorium spaces	DM BG11: Blue and green infrastructure plans
IIA1: Climate change mitigation	++	0	0	0	0	0	0	+	0	0	+
IIA2: Climate change adaptation	+	0	0	0	0	0	0	+	0	0	+
IIA3: Housing	0	0	0	-	-	0	0	0	0	0	0
IIA4: Health and wellbeing	++	+	0	0	0	++	+	0	+	--?/+	+
IIA5: Services and facilities	+	0	0	0	0	0	0	0	0	0	0
IIA6: Social inclusion	+	0	0	0	0	+	+	0	+	0	+
IIA7: Crime and community safety	0	0	0	0	0	0	0	0	0	0	+
IIA8: Road safety	+	0	0	0	0	0	0	0	0	0	0
IIA9: Economy	0	0	0	-	+/-	0	0	0	0	0	0
IIA10: Town and local centres	+	0	0	0	0	0	0	0	0	0	0
IIA11: Air pollution	+	0	0	0	0	0	0	+	0	+/-?	+
IIA12: Sustainable transport	++	0	0	0	+	0	0	0	0	+/-	+
IIA13: Biodiversity	++	++	++	+	+	+	+	+	+	--?	+

Chapter 6

IIA findings for the policies in Chapters 4-15 of the Enfield Local Plan

Enfield Local Plan: Integrated Impact Assessment

June 2021

IIA objective	SP BG1: Enfield's blue and green infrastructure network	SP BG2: Protecting nature conservation sites	SP BG3: Biodiversity net gain, rewilding and offsetting	SP BG4: Green Belt and Metropolitan Open Land	SP BG5: Green Belt and edges of the countryside/urban areas	DM BG6: Protecting open space	DM BG7: Watercourses	DM BG8: Urban greening and biophilic principles	DM BG9: Allotments and community food production	DM BG10: Burial and crematorium spaces	DM BG11: Blue and green infrastructure plans
IIA14: Historic environment	+	0	0	+	0	+	0	0	0	0?	0
IIA15: Landscape and townscape	++	0	0	++	++	+	+	+	+	--	+
IIA16: Efficient use of land and materials	0	0	0	+	+	0	0	0	+	--	0
IIA17: Flooding	+	0	0	0	0	+	0	+	0	+	+
IIA18: Water	++	+	0	0	0	+	+/-	+	0	+?/-?	+

6.25 A number of policies are likely to contribute towards mitigating carbon emissions in the Borough either by reducing the need to travel or by promoting the use of more sustainable modes of transport such as walking and cycling. Significant positive effects are expected against **IIA1: Climate change mitigation** and **IIA12: Sustainable transport**, while a minor positive effect is expected against **IIA11: Air pollution** in relation to Policy SP BG1: Enfield's blue and green infrastructure network, as it seeks to enhance access to key destination points (e.g. town centres), community facilities and publicly accessible open spaces through walking, cycling and public transport. In addition, blue and green infrastructure will help to increase the Borough's capacity to sequester carbon emissions. Policy SP BG1: Enfield's blue and green infrastructure network is expected to have a minor positive effect in relation to these three objectives because it encourages walking through the provision of linear corridors and improved crossing/bridges, which may reduce reliance on the private car and associated CO₂ emissions, as well as minimising air pollution. Policy BG11: Blue and green infrastructure plans is also expected to have a minor positive effect against these three objectives because it supports the development of blue and green infrastructure, which is likely to include walking and cycle routes. The policy also states that the blue-green infrastructure plan submitted alongside major planning applications must demonstrate how the development will mitigate the impacts of air pollution. Policy SP BG5: Green Belt and edges of the countryside/urban areas is expected to have a minor positive effect against **IIA12: Sustainable transport** only because the policy supports limited infilling within existing settlements if the development would not lead to any significant increase in motorised traffic generation, as evidenced through a suitable traffic modelling tool. Therefore, this policy would encourage proposals that incorporate sustainable transport measures. Policy DM BG10: Burial and crematorium spaces is expected to have a mixed minor positive and minor negative effect against **IIA12: Sustainable transport** because two of the burial/crematorium sites are located within 1km of a railway station and 350m of a bus stop but are not located within close proximity to a Major, District or Local Centre, where most people are located. Therefore, people would potentially need to travel longer distances to reach the sites.

6.26 Policy DM BG8: Urban greening and biophilic principles sets out the Council's approach to urban greening and supports development that promotes opportunities to restore, create and enhance Enfield's tree and woodland resource. As such, the policy is expected to have minor positive effects in relation to **IIA1: Climate change mitigation** and **IIA11: Air pollution** because it promotes tree and woodland cover, which would help to improve air quality and aid carbon absorption. Policy DM BG11: Blue and green infrastructure plans is expected to have a minor positive effect in relation to IIA11 because a blue-green infrastructure plan must be submitted alongside major planning applications to demonstrate how the development will help people and wildlife adapt to the impacts of climate change. Policy DM BG10: Burial and crematorium spaces is expected to have a mixed minor positive and minor negative effect against IIA11 because although the policy states that development involving new burial and/or crematorium spaces or related facilities must demonstrate how it will appropriately respond to air pollution issues through the incorporation of mitigation measures, two of the sites allocated under this policy scored poorly in the air quality assessment. This is because they are likely to generate a number of trips via the private car, which would contribute towards air pollution. The negative effect is recorded as uncertain because the ban on the sale of petrol and diesel cars by 2030 is expected to reduce air pollution in the future.

6.27 Policy SP BG1: Enfield's blue and green infrastructure network makes reference to natural flood management through the naturalisation and catchment restoration of the river corridors along Salmons Brook, Turkey Brook and Pymmes Park. Therefore, a minor positive effect is expected in relation to **IIA2: Climate change adaptation**. Policy DM BG8: Urban greening and biophilic principles is also expected to have a minor positive effect in relation to this objective because it supports flood risk mitigation, prioritising areas at risk of flooding.

6.28 Policies SP BG4: Green Belt and Metropolitan Open Land and SP BG5: Green Belt and edges of the countryside/urban areas set out the Council's approach to preventing inappropriate development in the Green Belt, which includes housing. As such, both policies have the potential to restrict the delivery of housing in the Borough, with a minor negative effect expected against **IIA3: Housing**.

6.29 Policies SP BG1: Enfield's blue and green infrastructure network and DM BG11: Blue and green infrastructure plans seek to ensure that development proposals contribute to the creation of a continuous, multifunctional and integrated blue and green infrastructure network and will result in the provision of, and improved access to, open space in the Borough. In particular, Policy SP BG1 aims to create a continuous 'green-loop' extending from the open countryside into the main urban area and onto the Lee Valley Regional Park and Enfield Chase, as well as create a new publicly accessible landscape (Enfield Chase – London National Park City) comprising new woodland, open space and extensive rewilding. Policy SP BG1 also includes the creation of a new world-class sports village at Enfield Playing Fields, Hotspur Way and Firs Farm. The policy would therefore improve access to open space and sports facilities, which would contribute to improving the physical and mental wellbeing of Enfield's

residents. Therefore, Policy SP BG1 is expected to have a significant positive effect in relation to **IIA4: Health and wellbeing**, whilst Policy DM BG11 is expected to have a minor positive effect in relation to this objective. Policy DM BG6: Protecting open space is also expected to have a significant positive effect in relation to this objective because it seeks to prevent the loss of open space and only supports development on existing designated open space if it promotes the multifunction and shared use of the open space.

6.30 Policy DM BG7: Watercourses promotes development that facilitates sport and recreational uses, thereby providing the Borough's residents with more opportunities for healthier and more active lifestyles. The policy also supports permanent residential and commercial moorings where they do not have any adverse impacts on the amenity of surrounding residents and public enjoyment of the water space. Therefore, Policy DM BG7 is expected to have a minor positive effect in relation to **IIA4: Health and wellbeing**. Policy DM BG9: Allotments and community food production is also expected to have a minor positive effect in relation to IIA4 because it promotes access to healthy and affordable food through allotments and community food production. According to the policy, there will be in-principle support for new allotments and community gardens/orchards. A minor positive effect is also expected for Policy SP BG2: Protecting nature conservation sites because mitigation relating to recreation will ensure people continue to have appropriate access to high quality outside spaces for recreation. Policy DM BG10: Burial and crematorium spaces is expected to have a mixed significant negative and minor positive but uncertain effect against **IIA4: Health and wellbeing** because although three of the four burial/crematorium spaces allocated in the policy contain an area of open space and/or a cycle path that could be lost to development, the policy ensures there are appropriate local places for dignified burial and cremation.

6.31 Policy SP BG1: Enfield's blue and green infrastructure network seeks to enhance access to Enfield's town centres, community facilities and publicly accessible open spaces by maximising green grid links, which would encourage walking and cycling, and states that the Council will support the creation of a continuous 'green-loop' that extends into the main urban area. As such, this policy is likely to improve access to services and facilities, particularly to those located within town centres, and so a minor positive effect is expected against **IIA5: Services and facilities** in relation to this policy.

6.32 Several policies will contribute towards reducing inequalities in access to open space, which has been identified as a key sustainability issue within the Borough, particularly between the east and west. Policy SP BG1: Enfield's blue and green infrastructure network seeks to improve and enhance access to open space and outdoor sports (including playing pitches and ancillary sporting facilities) in locations which experience the highest level of deficiency within the Borough. Policy DM BG6: Protecting open space only supports development on existing designated open space if it will promote the multifunctional and shared use of existing open space, encouraging interaction between different groups of people, whilst Policy DM BG11: Blue and green infrastructure plans seeks to maximise access to open spaces via the wider blue-green network in areas where there is poor or unequal access to open space and nature. In addition, Policy DM BG7: Watercourses promotes the development of continuous public access along the towpaths, so there are no breaks in the path and the space is accessible to all, while Policy DM BG9: Allotments and community food production will seek to ensure that new food growing spaces are accessible to everyone and that there is no net loss of allotment provision, encouraging interaction between residents. As such, minor positive effects are expected against **IIA6: Social inclusion** in relation to all of these policies.

6.33 Policy DM BG11: Blue and green infrastructure plans is expected to have minor positive effects in relation to **IIA7: Crime and community safety** because the blue-green infrastructure plans submitted alongside major planning applications must demonstrate how blue-green features will be managed in terms of safety and security arrangements. Policy SP BG1: Enfield's blue and green infrastructure network is expected to have a minor positive effect in relation to **IIA8: Road safety** because it makes provision for new crossings/bridges over the A10, A406 and Lee Valley line to overcome the east-west severance, which is expected to improve safety as residents would no longer need to cross these busy roads.

6.34 Policy SP RE1: Development in the Green Belt is expected to have a minor negative effect against **IIA9: Economy** as it sets out criteria to avoid the unsuitable redevelopment of previously developed sites and may therefore restrict the provision of employment development in the Borough. However, the policy also sets out criteria to permit the development of dwellings in order to support rural businesses, such as if a dwelling is essential to sustain the viability of a farming enterprise, resulting in a minor positive effect against this objective. As such, a mixed minor positive and minor negative effect is expected in relation to **IIA9: Economy**. Policy SP BG4: Green Belt and Metropolitan Open Land sets out the Council's approach to preventing inappropriate development in the Green Belt, which includes employment development. Therefore, this policy could potentially restrict the delivery of employment land within the Borough, with a minor negative effect expected against IIA9.

6.35 Policy SP BG1: Enfield's blue and green infrastructure network aims to maximise links and public access to key destination points such as town centres and the main urban area. The policy is therefore likely to enhance the vitality and vibrancy of the Borough's town centres, resulting in a minor positive effect against **IIA10: Town and local centres**.

6.36 Policy SP BG1 states that development should protect and enhance significant ecological features, achieve biodiversity net gain and maximise opportunities for urban greening through the planting of street trees, in addition to requiring Sites of Importance for Nature Conservation and areas of biodiversity deficiency to be reviewed every five years to ensure development contributes as appropriate to the Borough's nature recovery network. The policy also seeks to link green spaces with identified wildlife corridors, in addition to creating a new woodland and extensive rewilding. New habitats will also be introduced to the river corridor. For these reasons, Policy SP BG1 is expected to have a significant positive effect in relation to **IIA13:**

Biodiversity. Significant positive effects are also expected in relation to Policies SP BG2: Protecting nature conservation sites and SP BG3: Biodiversity net gain, rewilding and offsetting as they will ensure that development protects, maintains and enhances habitat and wildlife resources in Enfield and seeks to achieve a net gain in biodiversity, including through ecological enhancements to the Borough's watercourses. A significant positive effect is also expected for Policy DM BG11: Blue and green infrastructure plans against this objective because it requires a blue-green infrastructure plan to be submitted alongside major planning applications, demonstrating how development will prevent net loss, damage or deterioration to blue-green assets and contribute towards delivering identified opportunities and priorities set out in the Blue and Green Strategy.

6.37 Policies SP BG4: Green Belt and Metropolitan Open Land and SP BG5: Green Belt and edges of the countryside/urban areas are expected to have minor positive effects in relation to **IIA13: Biodiversity** because they prevent inappropriate development on Green Belt and Metropolitan Open Land, a large proportion of which comprises greenfield land which may have biodiversity value. However, it is noted that many brownfield sites are also biodiverse and home to rare species. Policy DM BG8: Urban greening and biophilic principles sets out the Council's approach to urban greening and supports development that promotes opportunities to restore, create and enhance tree and woodland cover in Enfield, particularly areas that are deficient in terms of access to nature, whilst Policy DM BG6: Protecting open space requires proposals to avoid harm to the ecological value of open space. Policy DM BG9: Allotments and community food production supports the development of allotments and community gardens/orchards, which are likely to have biodiversity value. As such, Policies DM BG8, DM BG6 and DM BG9 are expected to have minor positive effects in relation to IIA13. In addition, Policy DM BG7: Watercourses states that development within or adjacent to the Borough's watercourses will be expected to provide ecological and biodiversity enhancements to the Borough's water spaces, having regard to the principles of the Biodiversity Action Plan. As such, a minor positive effect against IIA13 is also expected in relation to this policy. Policy DM BG10: Burial and crematorium spaces is expected to have a significant negative effect against this objective because all four burial/crematorium sites allocated under this policy contain or are within 100m of a Priority Habitat, with one of the sites also located within 250m of two SINC's. The effect is recorded as uncertain because appropriate mitigation may avoid adverse effects and may even result in beneficial effects.

6.38 Policy SP BG1: Enfield's blue and green infrastructure network includes measures to provide blue and green infrastructure within the restoration and enhancement of registered historic parks and gardens (Trent Park, Grovelands Park and Myddelton House Gardens and Broomfield Park) and associated visitor attractions. As a result, the policy will facilitate the protection and enhancement of the Borough's historic environment and is expected to have a minor positive effect against **IIA14: Historic environment**. A minor positive effect is also expected for Policies DM BG4: Green Belt and Metropolitan Land DM BG6: Protecting open space against this objective because while CM BG6 requires proposals to avoid harm to the heritage value of existing open spaces, DM BG4 seeks to protect the openness of the Green Belt which may indirectly help protect the setting of nearby heritage assets. Policy DM BG10: Burial and crematorium spaces is expected to have a negligible but uncertain effect in relation to this objective because although two of the crematorium sites are more than 500m from the nearest designated heritage asset, both sites could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m. The cemetery and natural burial site were not considered to affect the historic environment because they are unlikely to contain built development.

6.39 Policies SP BG1: Enfield's blue and green infrastructure network, SP BG4: Green Belt and Metropolitan Open Land and SP BG5: Green Belt and edges of the countryside/urban areas are expected to have significant positive effects in relation to **IIA15: Landscape and townscape** because they seek to ensure that development within or adjacent to the Green Belt and Metropolitan Open Land has respect for the character of its surroundings and local landscape and sets out requirements for development within the Green Belt and Metropolitan Open Land to preserve the openness and minimise visual impacts. Policy DM BG6: Protecting open space is likely to protect the landscape of the Borough, as it includes the provision of, and provides protection to, designated open space. Several policies make reference to landscaping schemes, including Policy DM BG7:

Watercourses, Policy DM BG8: Urban greening and biophilic principles, Policy DM BG9: Allotments and community food production and DM BG11: Blue and green infrastructure plans. These policies are therefore expected to have minor positive effects in relation to IIA15. Policy DM BG10: Burial and crematorium spaces is expected to have a significant negative effect against this objective because the two crematorium sites would result in the loss of open space. The cemetery and natural burial site were not considered to affect the landscape because they are unlikely to contain built development.

6.40 Policy DM BG9: Allotments and community food production seeks to promote food growing provision in areas including road verges and vacant or underused sites and seeks to integrate food growing spaces with other uses such as sport and play facilities, resulting in a minor positive effect against **IIA16: Efficient use of land and materials**. Policies DM BG4: Green Belt and Metropolitan Open Land and DM BG5: Green Belt and edges of the countryside/urban areas prevent development within the Green Belt and on Metropolitan Open Land and are therefore likely to increase pressure for development elsewhere within the Borough, potentially in the more built up areas on previously developed land. As such, both policies are expected to have a minor positive effect in relation to this objective.

6.41 Minor positive effects are expected against **IIA17: Flooding** in relation to several policies. Policy DM BG11: Blue and green infrastructure plans seeks to ensure that naturalised forms of flood storage are included as part of blue-green infrastructure proposals, which will help the Borough adapt to the expected impacts of climate change on flood risk. Policy DM BG6: Protecting open space seeks to ensure that development on existing designated open space avoids harm to the flood risk levels within and beyond the site. Policy DM BG8: Urban greening and biophilic principles sets out the Council's approach to urban greening and supports development that promotes opportunities to restore, create and enhance tree and woodland cover in Enfield, including areas of flood risk and as such. Policy SP BG1: Enfield's blue and green infrastructure network is also expected to have a minor positive effect in relation to this objective because it makes reference to natural flood management through the naturalisation and catchment restoration of the river corridors along Salmons Brook, Turkey Brook and Pymmes Park.

Policy SP BG1: Enfield's blue and green infrastructure network is expected to have a significant positive effect in relation to **IIA18: Water** because it seeks to improve the wider water environment by naturalising the riverbank and introducing new habitats to the river corridor. Policies that seek to address flood risk and prevent flooding are also likely to help inhibit water contamination. As such, Policies SP BG1, DM BG6, DM BG8 and DM BG11 are also expected to have minor positive effects against IIA18. Policy SP BG2: Protecting nature conservation sites states that development will not be permitted where it would adversely affect (directly or indirectly) the integrity of William Girling Reservoir and Chingford Reservoirs. Therefore, it is expected to help protect water quality within these SSSIs, with a minor positive effect against IIA18. Policy DM BG7: Watercourses aims to ensure that development within or adjacent to the Borough's watercourses provide ecological and biodiversity enhancement. However, the policy also promotes opportunities to facilitate water-borne freight and passenger transport along the River Lea Navigation, which could pollute the water. As such, a mixed minor positive and minor negative effect is expected against IIA18 in relation to this policy. In addition, Policy DM BG10: Burial and crematorium spaces allocates four burial/crematorium sites, three of which fall within a Source Protection Zone and the other which contains a number of brooks. However, the policy states that development proposals involving the provision of new burial and/or crematorium spaces or related facilities must respond to potential flood risk and water pollution issues through the incorporation of mitigation measures. Therefore, while a minor positive effect is expected in relation to **IIA17: Flooding**, a mixed minor positive and minor negative effect is expected against **IIA18: Water**. The effects for IIA18 are recorded as uncertain because the extent to which water quality is affected would depend on construction techniques and the use of SuDS within the design.

6.42 The IIA findings for the sites allocated under Policy DM BG10: Burial and crematorium spaces are summarised in **Table 6.4** overleaf. These sites were appraised using the assumptions set out in **Appendix B**, and do not take potential mitigation into account.

6.43 Underneath Policy DM BG10, the draft Enfield Local Plan sets out six further policy options (A to F) that were considered by the Council when preparing this version of the plan. In IIA terms, Options A and B are not considered to be reasonable alternatives because Option A would not meet Enfield's need for burial space and Option B is not considered by the Council to be feasible as they have already reviewed existing sites and determined that extension and further intensification is not likely to be feasible to meet the identified need. Therefore, Options C to F have been subject to IIA, as summarised in **Table 6.5** and described following the table.

Table 6.4: IIA findings for the sites allocated under Policy DM BG10: Burial and crematorium spaces

Site	Size	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
Policy DM BG10: Burial and crematorium spaces																			
SA58: Alma Road Open Space (cemetery)	2.64	0	0	0	--?	0	0	0	0	0	0	-?	++/-	--?	0	0	0	-	--?
SA59: Firs Farm Recreation Ground (Part) (crematorium)	3.68	0	0	0	--?	0	0	0	0	0	0	--?	+	--?	0?	--	--	--	--?
SA60: Sloemans Farm (natural burial site)	47.46	0	0	0	0	0	0	0	0	0	0	-?	++/--	--?	0	0	0	-	--?
SA61: Church Street Recreation Ground (crematorium)	5.55	0	0	0	--?	0	0	0	0	0	0	--?	+	--?	0?	--	--	-	--?

6.44 The Local Plan presents six alternative options to Policy DM BG10: Burial and crematorium spaces, as follows:

- **A. Do nothing:** This is not considered a reasonable alternative because it would not meet the Borough's identified need for burial and crematorium spaces and forms the baseline against which Policy DM BG10 has been appraised.
- **B. Meet our objectively assessed needs ourselves in the urban area and extension of existing sites:** not considered a reasonable alternative because would not meet the identified need for burial and crematorium spaces.
- **C. Meet our needs through the re-use of graves:** reasonable alternative – see below appraisal.
- **D. Set a reduced target:** reasonable alternative – see below appraisal.
- **E. Meet our objectively assessed need with assistance from duty to cooperate partners:** reasonable alternative – see below appraisal.
- **F. Meet our objectively assessed need in the urban area first and new sites in the Green Belt:** reasonable alternative – see below appraisal.

6.45 Table 6.5 below summarises the IIA effects identified for the reasonable alternative options to Policy DM BG10, and the findings are described below the table.

Table 6.5: IIA findings for the reasonable alternative options to Policy DM BG10: Burial and crematorium space

IIA objective	C. Meet our needs through the re-use of graves	D. Set a reduced target	E. Meet objectively assessed needs with assistance from duty to cooperate partners	F. Meet out objectively assessed need in the urban area first and new sites in the Green Belt
IIA1: Climate change mitigation	0	0	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Housing	0	0	0	0
IIA4: Health and wellbeing	+/-	-	+/-	+/-
IIA5: Services and facilities	+/-	-	+/-	+
IIA6: Social inclusion	-?	-?	-?	+
IIA7: Crime and community safety	0	0	0	0
IIA8: Road safety	0	0	0	0
IIA9: Economy	0	0	0	0
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	0	-?	-?	+/-?
IIA12: Sustainable transport	0	-	-	+/-
IIA13: Biodiversity	0	-?	-?	-?
IIA14: Historic environment	0	-?	-?	0?
IIA15: Landscape and townscape	0	-?	-?	-?
IIA16: Efficient use of land	++	+?/-?	+?/-?	-

IIA objective	C. Meet our needs through the re-use of graves	D. Set a reduced target	E. Meet objectively assessed needs with assistance from duty to cooperate partners	F. Meet out objectively assessed need in the urban area first and new sites in the Green Belt
IIA17: Flooding	0	-?	-?	+/-
IIA18: Water	0	-?	-?	+/-

6.46 Given the narrow focus of these options, they are unlikely to have any effect on seven of the IIA objectives relating to climate change, housing, crime and community safety, road safety, economy and town and local centres. It has also been assumed that all options would result in a policy with similarly worded requirements to DM BG10 regarding any new burial or crematorium proposals coming forward. In addition, Option C: Meet our needs through the re-use of graves would be carried out at existing burial sites, therefore it is also unlikely to affect a number of the other IIA objectives relating to sensitivity of potential receptors because it would not involve any new development sites.

6.47 In relation to the other IIA objectives, Options E: Meet our needs with assistance from duty to cooperate partners and F: Meet our needs in the urban area first and new sites in the Green Belt are likely to have minor positive effects in relation to **IIA4: Health and wellbeing** as they ensure there are appropriate local spaces available for dignified burial and cremation. However, both options are also expected to have a minor negative effect in relation to this objective. This is because Option E would see provision met outside of the Borough, which is not a popular approach as according to the Burial Needs Assessment 2020⁴⁶, people generally prefer to be buried within their local area. It is also not understood whether adjacent authorities have sufficient understanding of their own provision and future requirements to be able to support Enfield's need. One of the sites listed under Option F falls within Church Street Recreation Ground Metropolitan Open Land, which is likely to be lost as a result of development, with adverse effects on access to open space and health and wellbeing. Option C: Meet our needs through the re-use of graves is expected to have a mixed minor positive and minor negative effect in relation to IIA4 because although this approach is already occurring in the Borough and considered a sustainable way of ensuring enough burial space is available in the Borough, it is a controversial approach that some people find insensitive. There is also no scope to reuse graves at Edmonton Cemetery and as such, there may be difficulties in meeting all burial and crematorium space needs. Option D: Set a reduced target is expected to have a minor negative effect in relation to this objective because reducing the target may mean that there are not enough burial or crematorium spaces to meet residents' needs within the Borough.

6.48 Similar effects are expected for each option in relation to **IIA5: Services and facilities** because it relates to ensuring sufficient community and religious infrastructure is provided in the Borough. Option C: Meet our needs through the re-use of graves is expected to have a mixed minor positive and minor negative effect because although this approach is already occurring in the Borough and considered a sustainable way of ensuring enough burial space is available in the Borough, it is a controversial approach that some people find insensitive, and may not be sufficient to meet all needs. Option D: Set a reduced target is expected to have a minor negative effect in relation to this objective because reducing the target may mean that there are not enough burial or crematorium spaces to meet residents' needs within the Borough. Options E: Meet our needs with assistance from duty to cooperate partners and F: Meet our needs in the urban area first and new sites in the Green Belt are likely to have minor positive effects in relation to IIA5 as they ensure there are appropriate local spaces available for dignified burial and cremation. However, option E would also have a minor negative effect in relation to this objective because people generally prefer to be buried within their local area and it may also not provide sufficient space to meet the Borough's need.

6.49 Option C: Meet our needs through the re-use of graves may not be accepted by different faiths and therefore a minor negative but uncertain effect is expected in relation to **IIA6: Social inclusion**. Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners may potentially increase inequalities in access to burial and crematorium sites because not providing enough burial or crematorium sites within the Borough and/or relying on neighbouring authorities or duty to cooperate partners for the provision of burial sites may extend distances between where people live and where their friends/relatives are buried and hence reduce their ability to visit the graves as frequently as they need to. There may also not

⁴⁶ <https://new.enfield.gov.uk/services/planning/enfield-burial-needs-assessment-2020-planning.pdf>

be public transport available to take them to the sites in neighbouring authorities if they do not have access to a car. Therefore, Options D and E are expected to have minor negative but uncertain effects in relation to IIA6. Option F would have a mixed minor positive and minor negative effect. This is because some sites may be located within close proximity to where residents live and therefore residents would have less distance to travel and should be able to access burial or crematorium sites via public transport which would help with social inclusion, however, some sites may still require travel by private car excluding some residents from easily accessing these sites.

6.50 Option D: Set a reduced target would result in an increase in reliance on neighbouring authorities, whilst Option E: Meet our needs with assistance from duty to cooperate partners is expected to exhaust existing burial/crematorium capacity and rely on neighbouring boroughs or on their duty to cooperate partners for their future demand. This could lead to an increase in travel as people will have longer distances between where they live and where the burial sites are and at least a percentage of those trips will be made using private cars of which the majority is assumed to be fossil fuel powered. Therefore, these options are expected to have minor negative but uncertain effects in relation to **IIA11: Air pollution**. Option F: Meet our needs in the urban area first and new sites in the Green Belt seeks to unlock potential urban sites for the growing demand and then explore opportunities in the Green Belt. Therefore, this option is expected to have a mixed minor positive and minor negative effect against IIA11. This is because some sites may be located within close proximity to where residents live and therefore reduce the need to travel elsewhere via the private car, whilst others may not. One of the sites listed under this option scored 2 in the air quality appraisal, which is the poorest score possible. This is because it is likely to generate a number of trips via the private car, which could contribute towards air pollution, particularly in areas of the Green Belt that are rural and more isolated than elsewhere within the Borough. However, it is assumed that as required in Policy DM BG10, development involving new burial and/or crematorium spaces or related facilities must demonstrate how it will appropriately respond to air pollution issues through the incorporation of mitigation measures. All negative effects are recorded as uncertain because the ban on the sale of petrol and diesel cars by 2030 is expected to reduce air pollution in the future.

6.51 Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are likely to have minor negative effects in relation to **IIA12: Sustainable transport**, because sites outside of the Borough may require people to travel long distances to visit graves and at least a proportion of them will be made using fossil fuel powered private vehicles. Option F: Meet our objectively assessed needs in the urban area first and new sites in the Green Belt is likely to have a mixed minor positive and minor negative effect against IIA12 because although one of the sites listed under this option is located within 1km of a railway station and 350m of a bus stop, it is not located within close proximity to a Major, District or Local Centre where most people are located, and may therefore require people to travel longer distances to visit burial and crematorium sites, potentially via the private car.

6.52 Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are likely to have minor negative but uncertain effects in relation to **IIA13: Biodiversity** because once existing burial/crematorium sites within the Borough are exhausted, the local authority will rely on neighbouring authorities or duty to cooperate partners who may also need to deliver new sites, and therefore development may take place on sites where biodiversity may be lost to development. Option F: Meet our objectively assessed needs in the urban area first and new sites in the Green Belt is expected to have a minor negative effect against this objective because the burial and crematorium sites listed under this option both contain a Priority Habitat. The effect is recorded as uncertain because appropriate mitigation may avoid adverse effects and may even result in beneficial effects.

6.53 Taking a precautionary approach, Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are expected to have minor negative but uncertain effects in relation to **IIA14: Historic environment** because it is unknown where the burial/crematorium sites will be located and the construction of a crematorium could potentially affect the setting of heritage assets. Option F: Meet our objectively assessed needs in the urban area first and new sites in the Green Belt is likely to have a negligible but uncertain effect in relation to IIA14 because although the sites listed are more than 500m from the nearest designated heritage asset, both sites could still have some potential for impacts on non-designated heritage features and effects may extend beyond 500m.

6.54 Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are likely to have minor negative but uncertain effects against **IIA15: Landscape and townscape** because it is unknown where the burial/crematorium sites will be located and the construction of a crematorium could potentially affect the landscape. Option F: Meet our needs in the urban area first and new sites in the Green Belt is expected to have a minor negative effect against this objective because the two sites listed under this option would result in the loss of open space. The effect is recorded as uncertain because the actual effect will depend on the final design, scale and layout of development.

6.55 Option C: Meet our needs through the re-use of graves seeks to reuse already existing burial/cremation sites and therefore is likely to have a significant positive effect in relation to **IIA16: Efficient use of land**. Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are expected to have mixed minor positive and minor negative but uncertain effects in relation to IIA16 as they seek to exhaust already existing sites first but rely on potential capacity of neighbouring authorities or duty to cooperate partners, which may include sites located on greenfield land. Option F: Meet our needs in the urban area first and new sites in the Green Belt is expected to have a minor negative effect against this objective because it would result in the loss of some greenfield land.

6.56 Options D: Set a reduced target and E: Meet our needs with assistance from duty to cooperate partners are expected to have minor negative but uncertain effects against **IIA17: Flooding** and **IIA18: Water** because although the Borough's burial/crematorium sites already exist, and exploitation of their capacity should have no effect on flooding, the Borough would need to rely on neighbouring authorities to ensure provision for the future demand and it is uncertain what sites would be made available and whether they would be at risk of flooding or not. If they are at risk of flooding, there is also potential for contamination of groundwater. Option F: Meet our needs in the urban area first and new sites in the Green Belt is expected to have a mixed minor positive and minor negative effect on IIA17 because although both sites listed are on greenfield land and partially fall within Flood Zone 3, the policy requires mitigation of flood risk, which could also help protect water quality.

7. Design and character

6.57 The likely sustainability effects of the design and character policies in Chapter 7 of the Enfield Local Plan are set out in **Table 6.6** and described below the table.

Table 6.6: IIA findings for the design and character policies

IIA objective	SP DE1: Delivering a well-designed, high quality and resilient environment	DM DE2: Design process and Design Review Panel	DM DE3: Inclusive design	SP DE4: Putting heritage at the centre of place making	DM DE5: Strategic and local views	DM DE6: Tall buildings	DM DE7: Creating liveable, inclusive and quality public realm	DM DE8: Design of business premises	DM DE9: Shopfronts and advertisement	DM DE10: Conserving and enhancing heritage assets	DM DE11: Landscape design	DM DE12: Civic and public developments	DM DE13: Housing standards and design	DM DE14: External amenity standards	DM DE15: Residential extensions
IIA1: Climate change mitigation	++	0	0	0	0	0	++	+	+	+	0	+	0	0	0
IIA2: Climate change adaptation	+	0	0	0	0	0	+	+	0	0	0	+	0	0	0
IIA3: Housing	0	0	0	0	0	0	0	0	0	0	0	0	+	0	-
IIA4: Health and wellbeing	+	0	+	0	0	+	+	+	0	0	0	++?	+	+	+
IIA5: Services and facilities	+	0	0	0	0	0	+	0	0	0	0	++?	0	0	0
IIA6: Social inclusion	+	0	++	+	0	+	++	+	0	0	0	+	+	+	0
IIA7: Crime and community safety	+	0	0	0	0	++	++	+	+	0	+	+	0	0	0
IIA8: Road safety	++	0	0	0	0	0	++	+	0	0	0	0	0	0	0
IIA9: Economy	+	0	0	0	0	0	0	++/-	-	0	0	0	0	0	0
IIA10: Town and local centres	0	0	0	0	0	0	+	0	+	0	0	0	0	0	0
IIA11: Air pollution	+	0	0	0	0	0	+	+	0	0	0	0	0	0	0
IIA12: Sustainable transport	++	0	0	0	0	0	++	+	0	0	0	0	+	0	0

Chapter 6

IIA findings for the policies in Chapters 4-15 of the Enfield Local Plan

Enfield Local Plan: Integrated Impact Assessment

June 2021

IIA objective	SP DE1: Delivering a well-designed, high quality and resilient environment	DM DE2: Design process and Design Review Panel	DM DE3: Inclusive design	SP DE4: Putting heritage at the centre of place making	DM DE5: Strategic and local views	DM DE6: Tall buildings	DM DE7: Creating liveable, inclusive and quality public realm	DM DE8: Design of business premises	DM DE9: Shopfronts and advertisement	DM DE10: Conserving and enhancing heritage assets	DM DE11: Landscape design	DM DE12: Civic and public developments	DM DE13: Housing standards and design	DM DE14: External amenity standards	DM DE15: Residential extensions
IIA13: Biodiversity	++	0	0	0	0	0	++	+	0	0	++	+	0	0	0
IIA14: Historic environment	+	+	+	++	+	+	+	+	+	++	+	0	0	0	+
IIA15: Landscape and townscape	++	+	0	+	++	++	++	+	++	+	++	+	+	0	+
IIA16: Efficient use of land and materials	+	0	0	0	0	+	0	+	0	0	0	+	0	0	0
IIA17: Flooding	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0
IIA18: Water	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0

6.58 Policies SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE7: Creating liveable, inclusive and quality public realm are expected to have significant positive effects in relation to **IIA1: Climate change mitigation**. Policy SP DE1 promotes the enhancement of nature in the urban environment and connecting functional ecological corridors and habitats, which would aid carbon absorption and help reduce emissions. The policy also states that development must put people before private vehicles and integrate land uses with sustainable modes of transport. Policy DM DE7 prioritises and supports pedestrian and cycle movement, helping minimise emissions from the private car, with reference also made in the policy to electric vehicle charging points. Policies DM DE10: Conserving and enhancing heritage assets and DM DE12: Civic and public developments are expected to have minor positive effects in relation to this objective because Policy DM DE10 seeks to improve thermal and energy efficiency in heritage assets, whilst Policy DM DE12 promotes urban greening measures within the Borough. Policy DM DE9: Shopfronts and advertisements is also expected to have a minor positive effect in relation to this objective because the policy refers to energy efficient lighting and will therefore help minimise emissions.

6.59 Policy SP DE1: Delivering a well-designed, high quality and resilient environment is expected to have a minor positive effect in relation to **IIA2: Climate change adaptation** because the policy requires developments to respond to environmental change and refers to the need for developments to be resilient in their use of resources both in construction and operation. Minor positive effects are also expected for Policies DM DE7: Creating liveable, inclusive and quality public realm and DM DE12: Civic and public developments because, according to Policy DM DE7, development should provide shelter at appropriate locations where seating has been installed so as to respond to appropriate sunlight and micro-climate conditions, whilst Policy DM DE12 requires development to be designed to be naturally ventilated so as to maximise daylight and shade. Policy DM DE8: Design of business premises is also expected to have a minor positive effect in relation to this objective because it supports sustainable design and construction techniques within development, such as triple glazing and mechanical ventilation.

6.60 Policy DM DE13: Housing standards and design is expected to have a minor positive effect in relation to **IIA3: Housing** because the policy addresses the housing needs of older and disabled people through the delivery of wheelchair accessible homes. Policy DM DE15: Residential extensions is expected to have a minor negative effect in relation to this objective because the policy may prevent people from adapting their homes in a way that meets their changing and/or specialist needs.

6.61 Policy DM DE8: Design of business premises outlines a number of requirements for new business development to maximise their contribution to the urban environment. The policy will support development that facilitates movement within the public realm through the provision of suitably located, safe, naturally lit and publicly accessible routes and will seek to ensure that new development creates a pleasant and safe environment for pedestrians, cyclists and vehicles. The policy will also encourage commuting via cycling and walking through the provision of relevant facilities, such as showers and changing facilities, which facilitate these modes of travel. The policy also supports an active frontage onto the public realm, which would increase 'eyes on the street'. As such, Policy DM DE8 is likely to contribute to the deterrence of crime and increase safety, as well as encouraging the use of more sustainable modes of transport such as walking and cycling which would minimise CO₂ emissions and air pollution. Minor positive effects are therefore expected against **IIA1: Climate change mitigation**, **IIA7: Crime and community safety**, **IIA11: Air pollution** and **IIA12: Sustainable transport**.

6.62 Policy DM DE12: Civic and public developments may have a significant positive effect in relation to **IIA4: Health and wellbeing** (although this is uncertain) because it supports the development of civic/public buildings which may include healthcare facilities, in addition to leisure and cultural facilities. Policies DM DE6: Tall buildings, SP DE1: Delivering a well-designed, high quality and resilient environment, DM DE7: Creating liveable, inclusive and quality public realm and DM DE14: External amenity standards are all expected to have minor positive effects in relation to this objective. This is because Policies DM DE6 and DM DE14 require the provision of high quality private and communal amenity and play space, access to which is particularly important following the COVID-19 pandemic which has highlighted inequalities in open space accessibility. Policies SP DE1 and DM DE7 promote more active modes of travel (i.e. walking and cycling), which will have beneficial effects on people's physical health and mental wellbeing. Policy SP DE1 also refers to biophilic principles, which focuses on the relationship humans have with the natural environment. Policies DM DE8: Design of business premises, DM DE13: Housing standards and design and DM DE15: Residential extensions all seek to protect the amenity of existing and new occupiers in terms of daylight, sunlight, outlook, privacy, overlooking, noise and disturbance. Therefore, all three policies are likely to ensure that residential amenity is protected and therefore a minor positive effect is expected in relation to IIA4. A minor positive effect is also expected for Policy DM DE3: Inclusive design because it will help narrow inequalities in health through inclusive design.

6.63 Policy DM DE12: Civic and public developments may have a significant positive effect in relation to **IIA5: Services and facilities** (although this is uncertain) because it supports the development of civic/public buildings which may include educational facilities and community halls. Policies SP DE1: Delivering a well-designed, high quality and resilient environment

and DM DE7: Creating liveable, inclusive and quality public realm are expected to have minor positive effects in relation to this objective because Policy SP DE1 supports the provision of a mix of compatible uses that work together to create viable places that respond to local needs, whilst Policy DM DE7 promotes improved access to public facilities (e.g. public toilets, water fountains, baby changing facilities, cycle changing and shower facilities).

6.64 A significant positive effect is expected for Policy DM DE3: Inclusive design against **IIA6: Social inclusion** because it requires all development proposals to submit an Inclusive Access Statement, which will help create more accessible, welcoming, and inclusive spaces. According to the policy, all development proposals will need to reflect the Borough's diverse population, demonstrate responsive engagement with affected user groups and support ease of access, in addition to dignified emergency evacuation provision. Policy DM DE7: Creating a liveable, inclusive and quality public realm is also expected to have a significant positive effect in relation to this objective because it discourages the development of gated communities or privatised areas of pseudo public realm which do not promote socially inclusive and cohesive neighbourhoods or connectivity between places. It also seeks to create safe and accessible routes and spaces for all users, particularly disabled and mobility impaired people, in addition to children in pushchairs. Policies DM DE6: Tall buildings, DM DE14: External amenity standards and SP DE1: Delivering a well-designed, high quality and resilient environment are expected to have minor positive effects in relation to this objective because DM DE6 and DM DE14 make provision for high quality private and communal amenity and play space, with Policy DM DE14 ensuring development is accessible to wheelchair users, whilst SP DE1 requires all spaces to be safe, social and inclusive. Policies DM DE12: Civic and public developments and DM DE13: Housing standards and design are also expected to have minor positive effects in relation to this objective because they make provision for inclusive access arrangements. Policy SM DE13 also requires no discernible differences between tenures. A minor positive effect is also expected for Policy SP DE4: Putting heritage at the centre of place making because it seeks to improve access to cultural, built and landscape heritage, while also demonstrating how inclusive design to heritage assets has been assessed and integrated. Likewise, Policy DM DE8 makes provision for inclusive access arrangements.

6.65 A significant positive effect is expected against **IIA7: Crime and community safety** with respect to Policy DM DE6: Tall buildings because the policy seeks to protect residents and users from fire and other emergency situations. Further to this, the policy makes reference to activating the street frontage, which can help reduce levels of crime through 'eyes on the street'. Likewise, Policy DM DE7: Creating a liveable, inclusive and quality public realm is expected to have a significant positive effect in relation to this objective because it promotes safety and counter-terrorism measures, whilst also seeking to increase activity and natural surveillance at ground floor level so as to increase safety. Policy SP DE1: Delivering a well-designed, high quality and resilient environment is expected to have a minor positive effect in relation to this objective because the policy seeks to ensure that all development creates safe and secure places that comply with the principles of Secured by Design. Minor positive effects are also expected for Policies DM DE9: Shopfronts and DM DE12: Civic and public developments in relation to IIA7 as both policies require development to include an active frontage. As with policy DM DE6: Tall buildings, an active frontage can help to reduce crime through 'eyes on the street'. Policy DM DE10: Landscape design is also expected to have a minor positive effect in relation to this objective because it states that new areas of landscape planting must be safe

6.66 Policies SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE7: Creating a liveable, inclusive and quality public realm are expected to have significant positive effects in relation to **IIA8: Road safety** because they both promote more active and sustainable modes of travel, with Policy SP DE1 requiring streets to be safe, uncluttered and suitable to their intended function and Policy DM DE7 promoting road safety and safer cycling and pedestrian movement around town centres and transport nodes. Policy DM DE8: Design of business premises will seek to ensure that the development of new business premises facilitates movement through the provision of safe, naturally lit and publicly accessible routes, which is likely to improve pedestrian safety. As such, a minor positive effect is expected against this objective. Policies SP DE1 and DM DE7 are also expected to have significant positive effects in relation to **IIA12: Sustainable transport** because they prioritise and support more active and sustainable travel modes (i.e. walking and cycling). Policy SP DE1 also promotes mixed-use development, which would reduce the need for people to travel as all the amenities they require are in one place. People would therefore not be as reliant on the private car, which would help minimise air pollution. Therefore, both policies are also expected to have a minor positive effect in relation to **IIA11: Air pollution**. Policy DM DE13: Housing standards and design is expected to have a minor positive effect in relation to IIA11 because it requires the provision of cycle parking.

6.67 Policy SP DE1: Delivering a well-designed, high quality and resilient environment is expected to have a minor positive effect in relation to **IIA9: Economy** because it requires all developments and interventions to be high quality and design-led, which may attract more residents to the area with beneficial effects on the economy. Policy DM DE8: Design of business premises is expected to have a mixed significant positive and minor negative effect against this objective because although it

makes provision for well-designed business premises that would help attract people into the office and encourage collaborative working, it could potentially restrict economic development due to the requirements set out within the policy and any knock on viability issues. A minor negative effect is expected for Policy DM DE9: Shopfronts and advertisement against IIA9 because the restrictions set out within the policy could impact on business advertising and signage.

6.68 Policy DM DE7: Creating liveable, inclusive and quality public realm is expected to have a minor positive effect in relation to **IIA10: Town and local centres** because it seeks to improve the public realm by taking account of the hierarchy of streets and opening up links and improved sightlines to high streets, which may increase footfall within the town and local centres. A minor positive effect is also expected for Policy DM DE9: Shopfronts and advertisement in relation to this objective because frontages that maintain visual interest would have beneficial effects on the street scene and potentially increase footfall.

6.69 Policies SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE7: Creating a liveable, inclusive and quality public realm are expected to have significant positive effects on **IIA13: Biodiversity** because both policies seek to enhance access to nature, as well as functional ecological corridors and habitats within the Borough. A significant positive effect is also expected for Policy DM DE11: Landscape design in relation to this objective because it requires all developments to provide a high quality, comprehensive hard and soft landscaping scheme that includes generous tree, shrub and hedgerow planting consisting of appropriate species and nursery stock in the context of the location, in addition to incorporating suitable wildlife habitats, including micro-habitats. Policies DM DE8: Design of business premises and DM DE12: Civic and public developments are expected to have minor positive effects in relation to IIA13 because DM DE8 seeks to maximise opportunities for inclusion of urban greening measures and integration with existing blue and green infrastructure, while DM DE12 states that development involving the construction of civic buildings must maximise opportunities for the inclusion of urban greening measures, biophilic design principles and integration with existing blue and green infrastructure.

6.70 Policies SP DE4: Putting heritage at the centre of placemaking and DM DE10: Conserving and enhancing heritage assets are expected to have significant positive effects in relation to **IIA14: Historic environment**, as both directly preserve, protect and enhance LBE's historic environment. Policy SP DE4: Putting heritage at the centre of placemaking seeks to ensure that new development in the Borough aligns with the Heritage Strategy, whilst Policy DM DE10 promotes development which conserves and enhances the significance of heritage assets. Policy DM DE6: Tall buildings supports the development of tall buildings in appropriate locations and states that proposals involving tall buildings must demonstrate how they will not harm the significance of heritage assets, including their settings and protected views. Therefore, Policy DM DE6 is expected to have a minor positive effect in relation to this objective. Policy DM DE5: Strategic and local views protects important vistas and may therefore help prevent any adverse effect that development might otherwise have on the setting of heritage assets within the Borough, with a minor positive effect also recorded against this objective. Policies SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE3: Inclusive design are also expected to have minor positive effects in relation to this objective because SP DE1 requires development to complement heritage assets, whilst SM DE3 requires development proposals to identify access enhancements for heritage assets, while maintaining the significance of the asset and its setting. Minor positive effects are also expected for Policies DM DE7: Creating liveable, inclusive and quality public realm and DM DE11: Landscape design because DM DE7 seeks to improve the public realm and local character of an area, which could potentially benefit the setting of heritage assets, whilst DM DE10 seeks to protect historic landscapes.

6.71 Policy DM DE8: Design of business premises is also expected to have a minor positive effect on **IIA14: Historic environment** because it only permits development that does not conflict with historic land/building use where this use contributes to the character, appearance and significance of a heritage asset or historic area. Likewise, Policy DM DE9: Shopfronts and advertisement requires the size, siting and illumination of advertisements within Conservation Areas to conserve or enhance heritage assets and protect the special characteristics and the overall visual amenity of the heritage asset and its setting. Therefore, Policy DM DE9 is also expected to have a minor positive effect in relation to this objective. A minor positive effect is also expected for Policy DM DE15: Residential extensions because proposals for flat roof dormers within a Conservation Area or setting of a listed building will be refused.

6.72 Policies SP DE1: Delivering a well-designed, high quality and resilient environment, DM DE5: Strategic and local views, DM DE7: Creating liveable, inclusive and quality public realm and DM DE11: Landscape design are expected to have significant positive effects in relation to **IIA15: Landscape and townscape** because they set out measures to protect and enhance local distinctiveness and to contribute to a sense of place in the Borough, with Policy DM E11 requiring all developments to provide a high quality, comprehensive landscape scheme and to protect historic landscapes. Policy SP DE1 promotes development which has an understanding of local context e.g. locally distinctive or historic patterns of development, whilst Policy DM DE5 states that new development is required to positively contribute to the setting and integrity of important local views and shorter-distance

local views. Policy DM DE7: Creating liveable, inclusive and quality public realm also highlights that new development must take account of existing streetscape, as well as opening up links and improved sightlines to civic buildings, transport hubs, high streets and areas of open space. Policy DM DE9: Shopfronts and advertisement is also expected to have a significant positive effect against this objective because it requires development involving the creation of new, or alterations to existing ground floor frontages and shop fronts to maintain visual interest with no detrimental impact on the streetscape. The frontage must respect the rhythm, style, materiality and proportions of the building/group of buildings of which they form part of (including the upper floors). Specifically, no more than 10% of the glazed area must be obscured at any one time and any window displays should be lit at night. With regard to advertisements, they should not be visually dominant nor lead to visual clutter. A significant positive effect is also expected for Policy DM EE6: Tall buildings which permits tall buildings only in areas where they are suitable and seeks to ensure that all tall buildings make a positive contribution to the skyline. The policy requires development to be of the highest architectural and design quality, and to relate well to the character of the immediate context and its surroundings, taking account of building heights, topography and the pattern of adjoining streets

6.73 Policy DM DE10: Conserving and enhancing heritage assets seeks to make a positive contribution to local character and distinctiveness, with a minor positive effect expected in relation to **IIA15: Landscape and townscape**. Policies SP DE4: Putting heritage at the centre of placemaking and DM DE13: Housing standards and design are also expected to have minor positive effects in relation to this objective because DM DE3 seeks to improve access to landscape heritage and DM DE13 requires new residential development to be appropriately located, taking into account the nature of the surrounding area, and to be of appropriate scale, bulk and massing. Policy DM DE13 also requires access, parking, cycle parking and refuse storage by reason of design or location, to not adversely affect the streetscape, and ensures hardstanding does not dominate the appearance of the street and cause harm to the character or appearance of the street. Minor positive effects are also expected for Policies DM DE12: Civic and public developments and DM DE15: Residential extensions in relation to this objective because DM DE12 seeks to positively address the public realm through means of enclosure, landscaping and the location and design of parking and servicing, whilst DM DE15 must have no adverse visual impact and have regard to the character of the local area.

6.74 Policy DM DE2: Design process and Design Review Panel is expected to have a minor positive effect in relation to both **IIA14: Historic environment** and **IIA15: Landscape and townscape** because it encourages all applications to seek pre-application advice and requires planning applications to be accompanied by a Design and Access Statement. Once an application is submitted, design quality must be maintained through to building completion. According to the policy, applications for significant major development will be reviewed by the Borough's Design Review Panel. Therefore, this policy is expected to protect and enhance both the historic environment and landscape/townscape through the aforementioned processes. Policy DM DE8: Design of business premises is also expected to have minor positive effects in relation to IIA14 and IIA15 because it seeks to enhance the public realm and locate servicing, parking and refuse to the rear of buildings so as to protect the townscape, in addition to ensuring that the massing and facades of buildings are made visually interesting through architectural detailing, height variation and fenestration. The policy seeks to create a distinct character and not conflict with historic land/building use where this contributes to the character, appearance and significance of a heritage asset or historic area.

6.75 Policy DM DE6: Tall buildings is expected to have a minor positive effect in relation to **IIA16: Efficient use of land and materials** because increasing the density of development through tall new buildings or extensions to existing tall buildings, is an efficient use of land. However, the policy contains a lot of criteria that the development of tall buildings must meet and could therefore restrict proposals for tall buildings. Policies SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE12: Civic and public developments are expected to have minor positive effects in relation to this objective because Policy SP DE1 promotes mixed-use development and the efficient use of resources within construction and operation, whilst Policy DM DE12 seeks to build flexibility into the design and layout of new development to meet future unanticipated needs over its lifetime. Policy DM DE8: Design of business premises is also expected to have a minor positive effect because it states that all new business premises must make efficient use of land.

6.76 Policies DM DE7: Creating liveable, inclusive and quality public realm and DM DE11: Landscape design are expected to have minor positive effects against **IIA17: Flooding** and **IIA18: Water** because they require proposals to provide sustainable drainage systems. Sustainable drainage systems help manage surface water, whilst also taking account of water quality. Policy DM DE11 also supports designs that facilitate floodplain compensation and preservation of flood flow routes.

8. Homes for all

6.77 The likely sustainability effects of the homes for all policies in Chapter 8 of the Enfield Local Plan are set out in **Table 6.7** and described below the table.

Table 6.7: IIA findings for the homes for all policies

IIA objective	SP H1: Housing development sites	SP H2: Affordable housing	DM H3: Housing mix and type	DM H4: Small sites and small housing development	DM H5: Supported and specialist housing	DM H6: Community led housing	DM H7: Build to rent	DM H8: Large scale purpose built shared housing	DM H9: Student accommodation	DM H10: Gypsy and Traveller accommodation
IIA1: Climate change mitigation	+?/-?	0	0	0	0	0	0	+	+	+
IIA2: Climate change adaptation	0	0	0	0	0	0	0	0	0	0
IIA3: Housing	++	++	++	++	++	++	++	++	++	++
IIA4: Health and wellbeing	++/--?	+	+	+	+	+	0	0	+	+
IIA5: Services and facilities	++	0	0	+	+	0	0	+	+	+
IIA6: Social inclusion	+	++	++	0	++	++	+	0	+	+
IIA7: Crime and community safety	0	0	0	0	0	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0	0	0	0	+
IIA9: Economy	+	+	+	+	+	+	+	+	+	+
IIA10: Town and local centres	++	0	0	+	0	0	0	0	+	0
IIA11: Air pollution	+?/-?	0	0	+	0	0	0	+	+	+
IIA12: Sustainable transport	+++?/--?	0	0	+	0	0	0	+	+	+
IIA13: Biodiversity	--?	0	0	0	0	0	0	0	0	+
IIA14: Historic environment	-?	0	0	0	0	0	0	0	0	+
IIA15: Landscape and townscape	-?	0	+	+	0	0	0	0	+	+
IIA16: Efficient use of land and materials	++/--?	0	0	++	0	0	0	0	0	0
IIA17: Flooding	-?	0	0	0	0	0	0	0	0	0
IIA18: Water	-?	0	0	0	0	0	0	0	0	0

6.78 All housing policies will contribute to a sufficient supply of homes in the Borough. These policies would directly address the identified key sustainability issues of a deficiency in housing supply and availability of affordable housing across the Borough. In particular, Policy SP H1: Housing development sites supports the delivery of at least 24,920 new dwellings in the Plan period up to 2039 through site allocations and Policy SP H2: Affordable housing would seek to secure 50% of all new homes across the Plan period as genuinely affordable. Policy DM H6: Community led housing will also seek to ensure that proposals for community-led housing optimise the use of land for residential development in contributing to the delivery of Enfield's strategic housing target as well as make provision for affordable housing. The remaining housing policies support a mix of housing types, including specialist housing and accommodation for students and Gypsies and Travellers. Therefore, significant positive effects are expected for these policies in relation to **IIA3: Housing**. All of these policies will also support the local economy by providing

accommodation for the working age population and therefore attracting more people of working age to the area, which will support aspirations for economic growth within the Borough. Therefore, minor positive effects are expected in relation to **IIA9: Economy**.

6.79 A number of the housing policies seek to protect the amenity of the Borough's residents, in addition to open space provision. Policy SP H2: Affordable housing requires development involving the provision of affordable housing to provide private outdoor space, whilst Policy DM H6: Community led housing supports proposals for community led housing that integrate adequate amenity space. Policy DM H9: Student accommodation seeks to ensure that proposals provide an acceptable level of amenity, whilst Policies DM H3: Housing mix and type, DM H4: Small sites and small housing development and DM H5: Supported and specialist housing also seek to protect amenity. Therefore, minor positive effects are expected against **IIA4: Health and wellbeing** in relation to these policies. A minor positive effect is also expected for Policy DM H10: Gypsy and Traveller accommodation, which requires proposals brought forwards for transit and permanent pitches to be suitably connected with healthcare facilities. Policy SP H1: Housing development sites is expected to have a significant positive effect in relation to this objective because it allocates sites for residential development, a number of which are located within close proximity to existing open space, walking paths and/or cycle paths, and is therefore likely to encourage active outdoor recreational activity and more active modes of travel, providing both physical and mental health benefits to residents. However, some of the allocated sites may also result in a loss of open space, walking paths and/or cycle paths, and therefore this significant positive effect is mixed with a potential but uncertain significant negative effect.

6.80 Policy SP H1: Housing development sites allocates sites for residential development, a number of which are located within close proximity of existing educational facilities such as primary schools or secondary schools and would therefore ensure that residents have access to these facilities. As such, a significant positive effect is expected against **IIA5: Services and facilities**. The effect is recorded as uncertain because it is unknown whether the existing schools will have capacity to accommodate new residents in the area, which will be set out within the Infrastructure Delivery Plan. Policies DM H5: Supported and specialist housing and DM H10: Gypsy and Traveller accommodation will ensure that development offers easy and safe access to community facilities, public transport and other services. Additionally, Policies DM H4: Small sites and small housing development, DM H8: Large scale purpose built shared housing and DM H9: Student accommodation seek to ensure that development is directed towards locations that are well-connected to local services, infrastructure and employment, such as the edge of town centres, local centres or other locations in proximity to services and facilities. Therefore, all policies are expected to have a minor positive effect against IIA5.

6.81 Policy SP H1: Housing development sites allocates sites for residential development, several of which are located within the 20% most deprived areas in England. Therefore, these site allocations would help regenerate these areas through new high quality development and the delivery of supporting infrastructure. A number of policies seek to ensure that the mixed demands of a growing population are met with a variety of housing sizes, types, tenures, and specialist accommodation. Policy SP H2: Affordable housing is likely to improve social inclusion through mixed residential schemes that include both market and affordable housing, while Policy DM H6: Community led housing will seek to ensure that provision for affordable housing is made through community led housing development, at the same time as encouraging interaction amongst residents and community groups. The provision of affordable housing will also help to address inequalities between different groups of people in the Borough, particularly in regard to the divide between the east and west of the Borough. Policies DM H5: Supported and specialist housing, DM H9: Student accommodation and DM H10: Gypsy and Traveller accommodation will support the provision of appropriate housing to meet the specialist needs of local people, including Gypsies and Travellers, disabled and vulnerable people, students, and the elderly, and will ensure that development contributes to the creation of inclusive and sustainable neighbourhoods. In particular, Policy DM H5 will provide options at a range of costs to suit residents' different financial circumstances, contributing to mixed, balanced, inclusive and sustainable neighbourhoods. Policy DM H3: Housing mix and type seeks to deliver a mix of homes that would meet a variety of people's needs, such as disabled and elderly people, in addition to being designed so they are 'tenure-blind' – all of which would help reduce social exclusion. The policy also sets out that at least 10% of new dwellings should be built to M4(3) wheelchair accessible dwelling standard. Policy DM H7: Build to rent will support the provision of rented accommodation that is affordable and is therefore likely to benefit people on a lower income who may not be able to afford their own home. Overall, Policies SP H2, DM H3, DM H5 and DM H6 are expected to have significant positive effects in relation to **IIA6: Social inclusion**, with the remaining housing policies expected to have minor positive effects in relation to this objective. Policy DM H10 is also expected to have a minor positive effect in relation to **IIA8 Road safety** because it requires sites for transit and permanent pitches to be safely accessed by pedestrians, vehicles and caravans.

6.82 Several of the housing policies are likely to contribute to the reduction of the use of private vehicles and encourage the use of more sustainable modes of transport, which will help minimise CO₂ emissions associated with the private car, as well as avoiding air pollution. Policies DM H10: Gypsy and Traveller accommodation, DM H4: Small sites and small housing development, DM H8: Large scale purpose built shared housing and DM H9: Student accommodation will seek to encourage and ensure that development is directed towards locations that are well-connected to local services and employment by walking and cycling, as well as having good public transport accessibility. In addition, Policy DM H8 will ensure that the design of purpose-built shared living development does not contribute to car dependency and Policy DM H9 requires development proposals to provide adequate cycle parking facilities. Therefore, all of these policies are expected to have minor positive effects against **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport**. Policy SP H1: Housing development sites allocates sites for residential development, a number of which are located within close proximity of a railway station and at least one bus stop or are located in proximity to a Local, District or Major Centre such as Enfield Town. As such, this policy is likely to encourage the use of more sustainable modes of travel such as public transport, walking and cycling, resulting in a significant positive effect against **IIA12: Sustainable transport**. As a result, minor positive effects are also expected against **IIA1: Climate change mitigation** and **IIA11: Air pollution** in relation to this policy, as the proximity of a number of site allocations to public transport nodes and walking and cycling routes may contribute to a reduction in the use of private vehicles and associated carbon emissions. Conversely, some of the site allocations are not located within close proximity of a railway station, bus stop or a Local, District or Major Centre and as such, are expected to have significant negative effects against **IIA12: Sustainable transport**. This is likely to encourage the use of private vehicles, resulting in minor negative effects against **IIA1: Climate change mitigation** and **IIA11: Air pollution** and therefore mixed effects are expected overall. In addition, these effects are dependent on the behaviour of individuals and choice of travel and therefore are recorded as uncertain. Policy SM H4: Small sites and small housing development is expected to have a minor positive effect in relation to **IIA11: Air pollution** and **IIA12: Sustainable transport** because it supports the development of sites that have good access to public transport.

6.83 Policy SP H1: Housing development sites allocates sites for residential development, a number of which are located within close proximity of a Major (i.e. Enfield Town), District (i.e. Palmers Green, Angel Edmonton, Southgate and Edmonton Green) or Local Centre (Arnos Grove, Bowes Road, Cockfosters, Green Lanes, Oakwood, etc.) and would therefore contribute to maintaining and enhancing the vitality and vibrancy of the Borough's centres. As such, this policy is expected to have a significant positive effect against **IIA10: Town and local centres**. Policies DM H4: Small sites and small housing development and DM H9: Student accommodation will direct residential development, including student accommodation, towards locations in close proximity to major/district/local centres and will therefore contribute to the enhancement of the vitality and vibrancy of the Borough's town centres through increased footfall. As such, minor positive effects are expected against IIA10 in relation to these policies.

6.84 Policies DM H3: Housing mix and type and DM H10: Gypsy and Traveller accommodation are expected to have minor positive effects in relation to **IIA15: Landscape and townscape** because development must have regard to the character of the area and be positively integrated into it, as well as ensuring that the impact of new Gypsy and Traveller accommodation development does not harm the landscape or visual character of the area, particularly the Green Belt. Policy DM H4: Small sites and small housing development supports development on vacant infill and backland plots, which would help enhance the character of these areas, resulting in a minor positive effect in relation to IIA15. Policy DM H10 seeks to ensure that the impact of new Gypsy and Traveller accommodation development does not harm the heritage assets or biodiversity of the area. The policy requires that adequate on-site facilities are provided, including water resources and supply, waste disposal and treatment, in order to avoid adverse impacts on the natural environment. As such minor positive effects are expected against **IIA13: Biodiversity** and **IIA14: Historic environment**. Policy SP H1: Housing development sites could have a minor negative effect in relation to **IIA14: Historic environment** and **IIA15: Landscape and townscape** because it directs some housing development to areas where Conservation Areas and Listed Buildings are present, as well as large open areas on the edge of settlements. However, policies within the Local Plan could help mitigate against any harm to the historic environment and landscape. The actual effects will also depend on the final design, scale and layout of development; therefore they are currently recorded as uncertain. Policy DM H9: Student accommodation is expected to have a minor positive effect on **IIA15: Landscape and townscape** only because development must not have a detrimental impact on the character of the local area. Some of the sites allocated in Policy SP H1 are also located within close proximity to biodiversity assets. Due to the fact some of the sites contain biodiversity assets, a potential but currently uncertain significant negative effect is identified against **IIA13: Biodiversity**.

6.85 Policy DM H4: Small sites and small housing development sets out the Council's approach to smaller sites and small housing development, and states that the Council will support development on vacant infill and backland plots, as well as

upward extensions of flats and the redevelopment of non-residential buildings in order to deliver additional housing. This policy is therefore likely to ensure the re-use and redevelopment of brownfield sites, contributing towards the efficient use of land in the Borough. As such, a significant positive effect is expected in relation to **IIA16: Efficient use of land and materials**. Policy SP H1: Housing development sites includes site allocations for residential development and a number of these sites are located on brownfield land. However, a small number of sites allocated within Policy SP H1 are located on greenfield land, some of which is Grade 3 agricultural land. Therefore, Policy SP H1 is expected to have a mixed (significant positive and significant negative) effect against this objective. The negative effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is considered to be high quality while Grade 3b is not).

6.86 A small number of sites allocated for residential development within Policy SP H1: Housing development sites partially fall within Flood Zone 3 and have a predicted peak flood depth of greater than 300mm. However, there are policies within the Local Plan that mitigate against flood risk and support the use of SuDS. As such, a minor negative effect is expected against **IIA17: Flooding**. Some of the sites allocated for residential development within Policy SP H1 fall within a Source Protection Zone or contain a watercourse or water body. As there are other policies included in the Plan that mitigate against flood risk and support the use of Sustainable Drainage Systems (SuDS), which could help prevent water contamination, a potential but uncertain minor negative effect is identified in relation to this objective.

6.87 Negligible effects are expected in relation to IIA2: Climate change adaptation and IIA7: Crime and community safety.

6.88 The IIA findings for the sites allocated under Policy SP H1: Housing development sites are summarised in **Table 6.8** overleaf. These sites were appraised using the IIA assumptions set out in **Appendix B**, but take into account potential mitigation and information requirements in the site proformas within Appendix B of the Local Plan.

Table 6.8: IIA findings for the sites allocated under Policy SP H1: Housing development sites

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
Policy SP H1: Housing development sites																				
Enfield Town (SP PL1)																				
SA1: St Anne's Catholic High School for Girls (housing)	1.76	236	0	0	++	++	++?	0	0	0	-	+	--?	++	--?	-?	+?	+	--	--?
SA2: Palace Gardens Shopping Centre (mixed-use)	3.73	350	0	0	++	++	++?	0	0	0	+?/-	+	--?	++	--?	-?	+?	++	0	--?
SA3: 100 Church Street (housing)	0.28	56	0	0	+	++	++?	0	0	0	-	+	--?	++	--?	-?	+?	+	-	--?
SA4: Enfield Town Station and Former Enfield Arms, Genotin Road (mixed-use)	0.58	100	0	0	+	++	++?	0	0	0	-	+	-?	++	--?	-?	+?	+	--	--?
SA5: Enfield Civic Centre (mixed-use)	1.41	150	0	0	++	++	++?	0	0	0	+?/-	+	--?	++	--?	-?	-?	+	--	--?
SA6: Southbury Road Superstore Area (mixed-use)	1.74	350	0	0	++	++	++?	0	0	0	+?/-	+	--?	++	--?	-?	+?	+	--	--?
SA7: Oak House, 43 Baker Street (housing)	0.26	55	0	0	+	++	++?	0	0	0	-	+	--?	++	--?	-?	+?	+	-	--?
Southbury (SP PL2)																				
SA8: Sainsburys Baird Road (mixed-use)	3.90	1041 homes and 20685 sq.m	0	0	++	++	++?	+	0	0	++?	0	--?	++/-	0	-?	+?	++	0	0
SA9: Colosseum Retail Park (mixed-use)	4.35	1587	0	0	++	++	++?	+	0	0	++?	0	--?	++	0	-?	+?	++	--	0
SA10: Morrisons, Southbury Road (mixed-use)	2.69	892	0	0	++	++	++?	0	0	0	++?	0	--?	++	0	-?	+?	+	--	0
SA11: Southbury Leisure Park (mixed-use)	2.96	450	0	0	++	++/-	++?	+	0	0	+?/-	0	--?	++	-?	-?	+?	+	--	0
SA12: Tesco, Ponders End, 288 High Street (mixed-use)	2.78	350	0	0	++	++	+?	+	0	0	++?	+	--?	++	0	0?	+?	+	-	--?
Edmonton Green (SP PL3)																				
SA13: Edmonton Green Shopping Centre (mixed-use)	10.39	1173	0	0	++	++/--?	+?	++	0	0	+?/-	+	--?	++	-?	-?	+?	++	--	--?
SA14: Chiswick Road Estate (Osward and Newdales) (housing)	2.37	272	0	0	++	++/--?	+?	+	0	0	-	+	--?	++	0	-?	+?	+	--	0
Angel Edmonton (SP PL4)																				
SA15: Joyce Avenue and Snells Park Estate (housing)	9.94	1217	0	0	++	++/--?	+?	0	0	0	++	+	--?	++	--?	-?	--	++	--	--?
SA16: Public House, 50-56 Fore Street (housing)	0.19	68	0	0	+	++	+?	+	0	0	-	+	--?	++	-?	-?	+?	+	--	--?
SA17: Upton Road and Raynham Road (housing)	1.92	198	0	0	++	++/--?	+?	+	0	0	-	+	--?	++	-?	-?	+?	+	--	--?
SA18: South east corner of North Middlesex University Hospital Trust of Sterling Way (housing site)	1.35	400	0	0	++	++	+?	0	0	0	++	0	--?	++	--?	-?	+?	+	--	0
Meridian Water (SP PL5)																				

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
SA19: IKEA store; Tesco Extra, 1 Glover Drive; Meridian Water, Willoughby Lane and Meridian Way (mixed-use)	36.94	5000	0	0	++	++/--?	+	+	0	0	++?	+	--?	++	--?	-?	+	++	--	--?
Southgate (SP PL6)																				
SA20: Asda Southgate, 130 Chase Side, Southgate (mixed-use)	1.66	165	0	0	++	--?	+	0	0	0	+?/-	+	--?	++	-?	-?	+	+	-	0
SA21: Southgate Office Village, 286 Chase Road (mixed-use)	0.55	125	0	0	++	++/-	+	0	0	0	+?/-	+	--?	++	-?	-?	+	+	--	0
SA22: M&S Food (mixed-use)	0.45	150	0	0	++	++/-	+	0	0	0	+?/-	+	--?	++	--?	-?	+	+	--	0
SA23: Minchenden Car Park and Alan Pullinger Centre (housing)	0.11	48	0	0	+	++/-	+	0	0	0	-	+	--?	++	--?	-?	+	+	0	0
New Southgate (SP PL7)																				
SA24: Arnos Grove Station Car Park (housing)	1.08	162	0	0	++	++/--?	++?	0	0	0	-	+	--?	++	--?	-?	--	+	--	0
SA25: Site between North Circular Road and Station Road (mixed-use)	1.13	230	0	0	++	++	+	+	0	0	++?	0	--?	++/-	--?	-?	+	+	--	0
SA26: Station Road, New Southgate (mixed-use)	1.37	203	0	0	++	++	+	+	0	0	++	0	--?	++/-	--?	0?	+	+	--	0
Crews Hill (SP PL9)																				
SA27: Land at Crews Hill (housing)	114.04	3000	0	0	++	++/--	+	0	0	0	-	0	-?	++/--	--?	-?	--?/+?	++/--?	--	--?
Chase Park (SP PL10)																				
SA28: Land at Chase Park (housing)	118.02	3000	0	0	++	++	++?	0	0	0	-	+	-?	++	--?	-?	--?	--?	--	--?
SA29: Arnold House (housing)	1.35	62	0	0	+	++/-	-?	0	0	0	-	0	-?	++/--	--?	0?	-?	--?	--	0
Other proposed site allocations outside of the placemaking areas (urban areas)																				
SA30: Claverings, Centre Way (mixed-use)	2.42	587	0	0	++	++	++?	+	0	0	++?	0	-?	+	-?	0?	-?	++	--	--?
SA31: Cockfosters Station Car Park (Parcels a and b), Cockfosters Road, Barnet (housing)	1.37	316	0	0	++	++	+	0	0	0	-	+	-?	++	--?	0?	-?	+	0	0
SA32: Sainsburys Green Lanes (mixed-use)	3.94	299 homes and 13325 sq.m	0	0	++	++/--?	++?	0	0	0	+?/-	+	-?	++	--?	0?	+	+	--	--?
SA33: Blackhorse Tower, Holbrook House and Churchwood House, 116 Cockfosters Road (housing)	1.25	200	0	0	++	++	+	0	0	0	-	+	-?	++	--?	0?	+	+	--	0
SA34: 241 Green Street (mixed-use)	0.45	92	0	0	++	++/-	+	+	0	0	++?	+	-?	++	-?	0?	+	+	--	--?
SA35: Land at former Wessex Hall Building (housing)	0.38	110	0	0	++	--?/+	+	+	0	0	++	0	-?	++	--?	0?	--	+	--	--?
SA36: 188-200 Bowes Road (housing)	0.48	86	0	0	+	++	++?	0	0	0	-	+	--?	++	-?	0?	+	+	--	--?
SA37: Main Avenue Site (housing)	4.49	82	0	0	+	++/--?	++?	+	0	0	-	+	--?	++	-?	-?	+	++	--	0

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
SA38: Land at Ritz Parade (mixed-use)	0.65	79	0	0	+	++	++?	0	0	0	+/-	+	--?	++	-?	-?	+?	+	--	--?
SA39: Travis Perkins Palmers Green, Bridge Drive, Bloomfield Lane (mixed-use)	0.62	76 homes and 3200 sq.m	0	0	+	++/--?	+?	0	0	0	+?/-	+	--?	++	--?	0?	+?	+	--	--?
SA40: Land known as Brimsdown Sports Ground (mixed-use)	8.11	50	0	0	+	--?/+	+?	+	0	0	+?/-	+	-?	++	-?	0?	+?	--	-	0
SA41: Albany Leisure Centre and Car Park, 55 Albany Road (housing)	0.63	30	0	0	+	++	+?	+	0	0	-	+	-?	++	0	0?	+?	+	--	--?
SA42: Fords Grove Car Park (housing)	0.24	24	0	0	+	++	++?	0	0	0	-	+	-?	++	--?	0?	+?	+	0	--?
SA43: Lodge Drive Car Park (incl. Depot) (housing)	0.67	50	0	0	+	++	+?	0	0	0	-	+	--?	++	--?	-?	+?	+	-	--?
Other proposed site allocations outside of the placemaking areas (outside urban areas)																				
SA44: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road (mixed-use)	4.07	270	0	0	++	++/--?	++?	0	0	0	+?/-	0	--?	++/-	--?	0?	--?	--?	--	--?
SA45: Land between Camlet Way and Crescent Way, Hadley (housing)	11.05	160	0	0	++	++/-	+?	0	0	0	-	+	-?	++/--	--?	-?	--?	--?	-	--?

9. Economy

6.89 The likely sustainability effects of the economy policies in Chapter 9 of the Enfield Local Plan are set out in **Table 6.9** and described below the table.

Table 6.9: IIA findings for the economy policies

IIA objective	SP E1: Employment and growth	SP E2: Promoting jobs and inclusive business growth	SP E3: Protecting employment locations and managing change	SP E4: Supporting offices	SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites	DM E6: Redevelopment of non-designated industrial sites	DM E7: Providing for workspaces	DM E8: Local jobs, skills and local procurement	DM E9: Fostering a successful evening and night-time economy	DM E10: Creating a smart and digitally connected Borough
IIA1: Climate change mitigation	+/-?	+	+	+	+	0	+	0	0	+
IIA2: Climate change adaptation	0	0	0	0	0	0	0	0	0	0
IIA3: Housing	++	0	0	0	0	0	0	0	0	0
IIA4: Health and wellbeing	++/--?	+	0	0	+	0	0	0	+	+
IIA5: Services and facilities	++?	+	0	0	0	0	0	+	0	0
IIA6: Social inclusion	+	+	0	0	0	0	0	+	+	0
IIA7: Crime and community safety	0	0	0	0	0	0	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0	0	0	0	0
IIA9: Economy	++	++	++	++	++	++	++	++	++	++
IIA10: Town and local centres	++	++	0	++	0	0	++	0	++	0
IIA11: Air pollution	+/-?	+	+	+	+	0	+	0	0	+
IIA12: Sustainable transport	++/--?	+	+	+	+	0	+	0	0	0
IIA13: Biodiversity	--?	0	0	0	+	0	0	0	0	0
IIA14: Historic environment	-?	0	0	0	0	0	0	0	0	0
IIA15: Landscape and townscape	-?	0	0	0	+	0	0	0	0	0
IIA16: Efficient use of land and materials	++/--?	+	0	+	++	0	0	0	0	0
IIA17: Flooding	-?	0	0	0	+	0	0	0	0	0
IIA18: Water	-?	0	0	0	+	0	0	0	0	0

6.90 Policy DM E7: Providing for workspaces is expected to have minor positive effects in relation to **IIA1: Climate change mitigation**, **IIA11: Air pollution** and **IIA12: Sustainable transport** because it supports the development of co-working spaces

within Enfield's centres, where more people are located. Therefore, people are located within closer proximity of their workspaces and can more easily walk or cycle to work, which will minimise CO₂ emissions and air pollution. Policies SP E2: Promoting jobs and inclusive business growth and SP E4: Supporting offices are also expected to have minor positive effects in relation to these three objectives because they support development within town centres, which are within easy reach of a range of services and facilities, whilst also supporting remote working. Therefore, people would not need to rely on the private car as they could more easily walk or cycle to work, or work from home. Policy SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites is expected to have a minor positive effect against these three objectives because it requires proposals to include walking and cycling links, which is expected to discourage use of the private car and minimise CO₂ emissions and air pollution. Policy DM E7: Providing for workspaces will also seek to provide co-working spaces and infrastructure to support home working, thereby contributing to a reduction in the need to travel and the use of private vehicles. Policy SP E3: Protecting employment locations and managing change will seek to encourage the inclusion of land for sustainable transport functions within SIL development. As such, a minor positive effect is expected against IIA1, IIA11 and IIA12 in relation to this policy. In addition, Policy DM E10: Creating a smart and digitally connected Borough promotes access to high quality digital connectivity services in new developments. This would enable smart technology use and reduce the need to travel to work, especially following the COVID-19 pandemic which has seen a significant increase in numbers of people working from home. As such, there would be a reduction in numbers of journeys made within the Borough, helping minimise CO₂ emissions and pollution associated with use of the private car. Policy DM E10 is therefore expected to have a minor positive effect in relation to **IIA1: Climate change mitigation** and **IIA11: Air pollution**.

6.91 Policy SP E1: Employment and growth allocates sites for industrial and mixed-use development, a number of which are located within close proximity of a railway station and at least one bus stop, or are located in proximity to a Local, District or Major Centre such as Enfield Town. As such, this policy is likely to encourage the use of more sustainable modes of travel such as public transport, walking and cycling, resulting in a significant positive effect against **IIA12: Sustainable transport**. Minor positive effects are expected against **IIA1: Climate change mitigation** and **IIA11: Air pollution** in relation to this policy, as the proximity of a number of the site allocations to public transport nodes and walking and cycling routes may contribute to a reduction in the use of private vehicles and carbon emissions. Conversely, the policy allocates development in rural areas and some of the site allocations are not located in close proximity to a railway station, bus stop or a Local, District or Major Centre and therefore a significant negative effect is also expected against IIA12. This is likely to encourage the use of private vehicles, resulting in minor negative effects against IIA1 and IIA11 and therefore mixed effects overall. In addition, these effects are dependent on the behaviour of individuals and choice of travel and are therefore uncertain.

6.92 Several site allocations included in Policy SP E1: Employment and growth are allocated for mixed-use development for both employment and housing. As such, these sites will make provision for housing in the Borough, resulting in a significant positive effect against **IIA3: Housing**.

6.93 Policy SP E2: Promoting jobs and inclusive business growth will support opportunities to encourage a broad-based economy, which serves the needs of residents and businesses through the growth of health and education sectors. As such, minor positive effects are expected against **IIA4: Health and wellbeing** and **IIA5: Services and facilities** in relation to this policy. Policy SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites is expected to have a minor positive effect in relation to **IIA4: Health and wellbeing** because it requires proposals to incorporate walking and cycling links, in addition to integrating blue and green infrastructure networks, which will encourage more active travel choices as well as access to green space. Policies DM E9: Fostering a successful evening and night-time economy and DM E10: Creating a smart and digitally connected Borough are expected to have minor positive effects in relation to this objective because both policies make reference to residential amenity and Policy DM E9 requires proposals to not create any unacceptable impact on neighbouring uses in terms of noise, traffic and disturbance taking account of the type and characteristics of other uses. Policy SP E1: Employment and growth allocates sites, some of which are allocated for mixed-use development for both employment and housing. As such, this policy is expected to have a significant positive effect in relation to IIA4 because a number of sites are located within close proximity to an area of open space, walking paths and/or cycle paths, and their development is therefore likely to encourage active outdoor recreational activity and more active modes of travel, providing both physical and mental health benefits to residents. However, some of the allocated sites may also result in the loss of existing open space, walking paths and/or cycle paths, and therefore this effect is mixed with a potential but uncertain significant negative effect.

6.94 Policy DM E8: Local jobs, skills and local procurement requires development to provide appropriate work-based training and apprenticeships, which would contribute towards enhancing the employability of the resident population and help address social exclusion. Therefore, Policy DM E8 is expected to have a minor positive effect in relation to **IIA5: Services and facilities**

and **IIA6: Social inclusion**. In addition, Policy SP E2: Promoting jobs and inclusive business growth seeks to provide co-working spaces and infrastructure to support home working, thereby allowing flexibility to support the employment of a wider range of people and different lifestyles and will seek to improve skills and training opportunities in order to facilitate investment and job creation in the Borough. As such, a minor positive effect is expected against IIA6 in relation to this policy. Policy DM E9: Fostering a successful evening and night time economy is also expected to have a minor positive effect in relation to IIA6 because it supports a socially inclusive evening and night time economy within the Borough's town centres, as well as outside town centres such as in smaller centres and parks.

6.95 Policy SP E1: Employment and growth allocates sites for both employment and residential development, a number of which are located within close proximity to existing educational facilities such as primary schools and secondary schools and would therefore ensure that access to these facilities is improved for the Borough's residents. As such, a significant positive effect is expected against **IIA5: Services and facilities**. The effect is recorded as uncertain because it is unknown whether the schools will have capacity to accommodate new residents in the area and, if an allocated site is not located in close proximity to an existing school, whether its development could stimulate the provision of new educational facilities. This information will be set out within the Infrastructure Delivery Plan.

6.96 Policy SP E1: Employment and growth includes site allocations for development, several of which fall within the 20% most deprived areas in England. Therefore, the development of these site allocations would help regenerate these areas through new high quality development and the delivery of supporting infrastructure. As such, a minor positive effect is expected against **IIA6: Social inclusion**.

6.97 All of the economic policies will contribute to the protection and enhancement of the local economy by aiming to attract and retain investment and ensure that opportunities for commerce and employment within LBE are secured. In particular, Policy SP E1: Employment and growth will seek to meet the identified economic needs for industrial and logistics floorspace and office floorspace in the Borough through specific site allocations, while Policies SP E2: Promoting jobs and inclusive business growth and SP E3: Protecting employment locations and managing change set out the Council's approach to supporting, protecting and enhancing the role and function of the Borough's employment locations and maximising the provision of employment floorspace and job creation. Policies SP E2 and Policy DM E7: Providing for workspaces also seek to provide co-working spaces and infrastructure to support home working, thereby allowing flexible employment and providing support for a variety of job types. Policy DM E10: Creating a smart and digitally connected Borough promotes the expansion of access to high quality digital connectivity services, which will stimulate economic growth within the Borough. All of these policies are therefore expected to have significant positive effects in relation to **IIA9: Economy**.

6.98 Policy SP E1: Employment and growth will seek to ensure the provision of office floorspace in Enfield's major and district centres, as well as Meridian Water, and is therefore likely to maintain the vibrancy and vitality of these locations. Policies SP E4: Supporting offices and DM E7: Providing for workspaces will support office provision in the Borough's centres including at Meridian Water, thereby maintaining the vitality of these centres. Policy DM E9: Fostering a successful evening and night-time economy promotes the expansion of the Borough's evening and night-time economy within the Borough's town centres and Meridian Water. As such, significant positive effects are expected against **IIA10: Town and local centres** in relation to these policies. By enabling development within town centre locations in the Borough, as well as supporting proposals that promote the diversification of town centre activities, Policy SP E2: Promoting jobs and inclusive business growth will protect and enhance the vitality and vibrancy of town centres within Enfield, resulting in a significant positive effect in relation to IIA10.

6.99 Policy SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites is expected to have a minor positive effect in relation to **IIA13: Biodiversity** because it requires proposals within SILs and LSISs to provide environmental improvements and take opportunities to incorporate urban greening and sustainable drainage systems (SuDS) and integrate with and enhance blue and green networks. Some of the sites allocated in Policy SP E1: Employment and growth are also located within close proximity to biodiversity assets or contain such assets; therefore a potential but uncertain significant negative effect is identified in relation to **IIA13: Biodiversity**.

6.100 Policy SP E1: Employment and growth could have minor negative effects in relation to **IIA14: Historic environment** and **IIA15: Landscape and townscape** because it supports new locations for industrial and logistics development in appropriate parts of the Green Belt but does not specify where in the Green Belt. The Green Belt is located in the more rural north west part of the Borough where there is much less built development and a number of Conservation Areas containing listed buildings are present, within the edge of the Green Belt. Development is also supported at the major and district centres, but which also tend to fall within Conservation Areas and within close proximity of a number of listed buildings, yet policies within the Local Plan

could help mitigate against any harm to the historic environment and landscape. However, the actual effects will depend on the final design, scale and layout of development; therefore is currently recorded as uncertain. Policy SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape** because it supports innovative design approaches to create a buffer and separation between any intensive uses and nearby sensitive uses, whilst also providing opportunities to incorporate urban greening and to enhance blue and green networks, with beneficial effects on the landscape.

6.101 Policies SP E1: Employment and growth, SP E2: Promoting jobs and inclusive business growth, SP E3: Protecting employment locations and managing change and SP E4: Supporting offices and SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites all support the intensification of employment land, which is an efficient use of previously developed land. In particular, Policy SP E5 encourages the intensification of industrial uses within SILs and LSISs through the more efficient use of space, higher plot ratios, the development of multi-storey schemes, and the assembling of sites within designated employment areas to assist with the delivery of more intensive formats. Policy SP E1 allocates some sites for development which are located on brownfield land. However, a small number of the sites allocated within Policy SP E1 are located on greenfield land, some of which is Grade 3 agricultural land. Therefore, Policy SP E1 is expected to have a mixed significant positive and significant negative effect in relation to **IIA16: Efficient use of land and materials**. The potential significant negative effect is recorded as uncertain because the GIS data available does not distinguish between Grades 3a and 3b agricultural land (Grade 3a is considered to be high quality while Grade 3b is not). Policy SP E5 is expected to have a significant positive effect in relation to this objective, while Policies SP E2 and SP E3 are likely to result in minor positive effects against this objective.

6.102 Policy SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites is expected to have a minor positive effect in relation to **IIA17: Flooding** and **IIA18: Water** because it requires the incorporation of SuDS, which will help to mitigate flood risk whilst also helping prevent water contamination. A small number of the sites allocated for development within Policy SP E1: Employment and growth are located within Flood Zone 3 or are at risk of surface water flooding. However, there are other policies within the Local Plan that will mitigate against flood risk and support the use of SuDS. As such, a potential but uncertain minor negative effect is identified in relation to **IIA17: Flooding**. Some of the sites allocated for development within Policy SP E1 fall within a Source Protection Zone or contain a watercourse or water body. As there are other policies included in the Local Plan that mitigate against flood risk and support the use of Sustainable Drainage Systems (SuDS), which could help prevent water contamination, a potential but uncertain minor negative effect is expected in relation to **IIA18: Water**.

6.103 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA7: Crime and community safety and IIA8: Road safety.

6.104 The IIA findings for the sites allocated under Policy SP E1: Employment and growth are summarised in **Table 6.10** overleaf.

Table 6.10: IIA findings for the sites allocated under Policy SP E1: Employment and growth

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
Policy SP E1: Employment and growth																				
Southbury (SP PL2)																				
SA8: Sainsburys Baird Road (mixed-use)	3.90	1041 homes and 20685 sq.m	0	0	++	++	++?	+	0	0	++?	0	--?	++/-	0	-?	++	++	0	0
SA46: Crown Road Lorry Park (industrial)	0.71	4530 sq.m	0	0	0	0	0	+	0	0	+	0	-?	++	0	-?	++	+	--	0
Meridian Water (SP PL5)																				
SA47: Ravenside Retail Park (industrial)	4.00	21645 sq.m	0	0	0	0	0	+	0	0	+	0	--?	++/-	--?	0?	++	++	--	--?
Crews Hill (SP PL9)																				
SA48: Land at 135 Theobalds Park Road (industrial)	1.64	3251 sq.m	0	0	0	0	0	0	0	0	+	0	-?	++/-	--?	0?	++	+	--	0
Other sites outside of the placemaking areas																				
SA39: Travis Perkins Palmers Green, Bridge Drive, Bloomfield Lane (mixed-use)	0.62	76 homes and 3200 sq.m	0	0	+	++/-?	++?	0	0	0	++/-	+	--?	++	--?	0?	++	++	--	--?
SA49: Land to the south of Millmarsh Lane, Brimsdown Industrial Estate (industrial)	5.19	32500 sq.m	0	0	0	0	0	+	0	0	+	0	-?	++/-	--?	0?	++	++	--	--?
SA32: Sainsburys Green Lanes (mixed-use)	3.94	299 homes and 13325 sq.m	0	0	++	++/-?	++?	0	0	0	++/-	+	-?	++	--?	0?	++	++	--	--?
SA50: 6 Morson Road (industrial)	0.83	2600 sq.m	0	0	0	0	0	+	0	0	+	0	0	++/-	--?	0?	-?	+	-	--?
SA51: Montagu Ind Estate (industrial)	5.69	6613 sq.m	0	0	0	0	0	+	0	0	+	0	--?	++	--?	0?	++	++	--	--?
SA30: Claverings, Centre Way (mixed-use)	2.42	587	0	0	++	++	++?	+	0	0	++?	0	-?	+	-?	0?	++	++	--	--?
SA52: Land West of Ramney Marsh (industrial)	12.01	70200 sq.m	0	0	0	0	0	0	0	0	++	0	--?	++/-	--?	0?	++	++	--	--?
SA53: Car Park Site, Wharf Road (industrial)	0.79	5115 sq.m	0	0	0	0	0	+	0	0	+	0	0	++/-	--?	0?	-?	+	--	--?
SA54: Land East of Junction 24 (industrial)	5.17	30550 sq.m	0	0	0	0	0	0	0	0	+	0	-?	-/+	--?	-?	--?	--?	--	--?
SA55: Land to the North West of Innova Park (industrial)	3.47	16445 sq.m	0	0	0	0	0	0	0	0	+	0	--?	++/-	--?	0?	++	++	--	--?

10. Town centres and high streets

6.105 The likely sustainability effects of the town centres and high streets policies in Chapter 10 of the Enfield Local Plan are set out in **Table 6.11** and described below the table.

Table 6.11: IIA findings for the town centres and high streets policies

IIA objective	SP TC1: Promoting town centres	SP TC2: Encouraging vibrant and resilient town centres	DM TC3: Floorspace above commercial premises	DM TC4: Markets	DM TC5: Meanwhile uses	DM TC6: Managing the clustering of town centre uses
IIA1: Climate change mitigation	+	+	+	0	0	0
IIA2: Climate change adaptation	0	0	0	0	0	0
IIA3: Housing	+	0	+	0	0	0
IIA4: Health and wellbeing	+	0	+	+	0	+
IIA5: Services and facilities	+	+	+	0	0	0
IIA6: Social inclusion	+	0	0	0	0	+
IIA7: Crime and community safety	+	+	0	0	0	0
IIA8: Road safety	0	0	0	0	0	0
IIA9: Economy	++	++	++	+	+	+
IIA10: Town and local centres	++	++	++	+	++	+
IIA11: Air pollution	+	+	+	0	0	0
IIA12: Sustainable transport	+	+	+	0	0	0
IIA13: Biodiversity	0	+	0	0	0	0
IIA14: Historic environment	+	+	0	0	0	0
IIA15: Landscape and townscape	+	+	0	+	+	+
IIA16: Efficient use of land and materials	++	++	++	0	0	0
IIA17: Flooding	0	0	0	0	0	0
IIA18: Water	0	0	0	0	0	0

6.106 Policy SP TC1: Promoting town centres is expected to have a minor positive effect in relation to **IIA1: Climate change mitigation** because it seeks to manage streets and spaces in a way that facilitates pedestrian and cycling movement. It also supports a diverse range of town centre uses, in addition to residential and employment development, which would reduce the need for people to travel longer distances via car to reach services and facilities, in addition to employment opportunities. Policies DP TC2: Encouraging vibrant and resilient town centres and DM TC3: Floorspace above commercial premises are also

expected to have minor positive effects in relation to this objective because like Policy SP TC1, they also support a mix of uses within the town centres, reducing the need to travel. Policy SP TC1 is also expected to have a minor positive effect in relation to **IIA3: Housing** because it supports appropriate and balanced residential development in town centre locations within the Borough. A minor positive effect is also expected for Policy DM TC3 in relation to IIA3 because it does not support proposals that may result in the net loss of residential floorspace.

6.107 Policy SP TC1: Promoting town centres supports pedestrian and cycle movement and a mix of uses within town centre locations, which will enable people to walk to a range of services and facilities, increasing levels of physical exercise. Policy DM TC4: Markets requires all proposals to make adequate arrangements to avoid or mitigate unreasonable impacts on residential amenity of adjoining and neighbouring occupiers, whilst Policy DM TC3: Floorspace above commercial premises requires no adverse effects on surrounding residential amenity, with both policies likely to have beneficial effects on people's mental wellbeing. Policy DM TC6: Managing clustering in town centres limit the concentration of services such hot food takeaways and betting shops in town centres likely to have a beneficial effect on people's health and wellbeing, particularly those who may be more vulnerable than others. Therefore, all three policies are expected to have a minor positive effect in relation to **IIA4: Health and wellbeing**.

6.108 Policies SP TC1: Promoting town centres, SP TC2: Encouraging vibrant and resilient town centres and DM TC3: Floorspace above commercial premises are expected to have minor positive effects in relation to **IIA5: Services and facilities** as they seek to provide good access to a competitive range of services and facilities in the Borough. Policy SP TC1 is also expected to have a minor positive in relation to **IIA6: Social inclusion** because it seeks to create a public welcome through improvements to the public realm, in addition to encouraging better connected communities, which will have beneficial effects on social cohesion. Policy DM TC6: Managing clustering in town centres is also expected to have a minor positive effect in relation to IIA6 because it states that all development should contribute to the delivery of inclusive and mixed communities.

6.109 Policies SP TC1: Promoting town centres and DP TC2: Encouraging vibrant and resilient town centres are expected to have minor positive effects in relation to **IIA7: Crime and community safety**. This is because Policy SP TC1 seeks to create a safe environment through public realm improvements and cultural attractions which activate the street, whilst Policy SP TC2 seeks to address anti-social behaviour and crime.

6.110 Significant positive effects are expected for Policies SP TC1: Promoting town centres, DP TC2: Encouraging vibrant and resilient town centres and DM TC3: Floorspace above commercial premises against **IIA9: Economy** and **IIA10: Town and local centres** because they promote economic growth in the Borough, particularly at town centre locations. Policy SP TC1 focuses investment within and around town centres, whilst Policy DP TC2 requires key centres within the Borough (i.e. Enfield Town Centre) to accommodate a diverse range of town centre and community uses, in addition to residential and employment development. Policy DM TC3 supports proposals involving employment-generating opportunities for small businesses, start-ups, and small workshops, in addition to the re-use and refurbishment of the upper floors of shops and/or commercial premises within Enfield's town centres, which may attract more people to the area and increase footfall. Policy DM TC5: Meanwhile uses is expected to have a significant positive effect in relation to IIA10 because it supports the expansion of temporary uses (e.g. creative, exhibition and performance spaces) in town and local centres, which would diversify the range of uses within the urban cores. Policies DM TC4: Markets and DM TC6: Managing clustering in town centres are expected to have minor positive effects in relation to **IIA10: Town and local centres** because new markets could increase footfall within town and local centres and Policy DM TC6 supports the vitality and viability of the Borough's town centres through a mix of development – all of which would have beneficial effects on the economy. For this reason, both policies are expected to have minor positive effects against **IIA9: Economy**. Policy DM TC5 is also expected to have a minor positive effect in relation to this objective.

6.111 Policies SP TC1: Promoting town centres, SP TC2: Encouraging vibrant and resilient town centres and DM TC3: Floorspace above commercial premises will help promote a modal shift away from the private car by promoting walking and cycling through delivering a mix of uses all in one place, helping to minimise air pollution. Therefore, all three policies are expected to have minor positive effects in relation to **IIA12: Sustainable transport** and **IIA11: Air pollution**.

6.112 Policy SP TC2: Encouraging vibrant and resilient town centres is expected to have a minor positive effect in relation to **IIA13: Biodiversity** because the policy promotes urban greening and enhancing links to blue and green networks.

6.113 A minor positive effect is expected against **IIA14: Historic environment** and **IIA15: Landscape and townscape** with respect to Policies SP TC1: Promoting town centres and SP TC2: Encouraging vibrant and resilient town centres as both policies seek to maintain and enhance distinctive features and characteristics of the Borough, including that of historical character. Further to this, a minor positive is anticipated for Policy DM TC5: Meanwhile uses in relation to IIA15 because it

would reduce the number of vacant units with town centres, enhancing the townscape. A minor positive effect is also expected for Policies DM TC4: Markets and DM TC6: managing clustering in town centres as DMTC4 requires no negative impacts on the appearance or functioning of the public realm, whilst DM TC6 only supports development in town centres that will not cause harm to the character of the area.

6.114 Policies SP TC1: Promoting town centres and DM TC3: Floorspace above commercial premises are expected to have significant positive effects in relation to **IIA16: Efficient use of land and materials** because they promote an efficient use of land within the Borough. Policy SP TC1 seeks to optimise the use of land around town centres, whilst Policy DM TC3 encourages a vertical mix of uses within vacant shops and other commercial premises.

6.115 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA8: Road safety, IIA17: Flooding and IIA18: Water.

11. Rural Enfield

6.116 The likely sustainability effects of the rural Enfield policies in Chapter 11 of the Enfield Local Plan are set out in **Table 6.12** and described below the table.

Table 6.12: IIA findings for the rural Enfield policies

IIA objective	DM RE1: Character of the Green Belt and open countryside	DM RE2: Improving access to the countryside and green corridors	SP RE3: Supporting the rural economy	DM RE4: Farm diversification and rural employment
IIA1: Climate change mitigation	0	+	+	+
IIA2: Climate change adaptation	0	0	0	0
IIA3: Housing	-	0	0	0
IIA4: Health and wellbeing	+	++	+	+
IIA5: Services and facilities	0	++	+	+
IIA6: Social inclusion	0	+	0	+
IIA7: Crime and community safety	0	0	0	0
IIA8: Road safety	0	+	+	0
IIA9: Economy	-	0	++	0
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	0	++	+	+
IIA12: Sustainable transport	0	++	+	+
IIA13: Biodiversity	+	0	0	+
IIA14: Historic environment	+	+	0	+
IIA15: Landscape and townscape	++	0	+	+

IIA objective	DM RE1: Character of the Green Belt and open countryside	DM RE2: Improving access to the countryside and green corridors	SP RE3: Supporting the rural economy	DM RE4: Farm diversification and rural employment
IIA16: Efficient use of land and materials	0	0	+	0
IIA17: Flooding	0	0	0	0
IIA18: Water	0	0	0	0

6.117 Policy DM RE2: Improving access to the countryside and green corridors will seek to ensure that new development protects, maintains and improves walking and cycling routes in the Borough and is therefore likely to encourage the use of more sustainable and active modes of travel. As such, Policy DM RE2 is expected to have significant positive effects in relation to **IIA11: Air pollution** and **IIA12: Sustainable transport**, and a minor positive effect in relation to **IIA1: Climate change mitigation**.

6.118 Policy SP RE3: Supporting the rural economy will seek to prevent development that results in a significant increase in the use of private vehicles and supports development which facilitates the use of sustainable transport, while Policy DM RE4: Farm diversification and rural employment will support proposals involving a diversification of use from agriculture to other business uses or sport and recreation activities provided the proposed use does not generate a significant number of additional vehicle trips. Therefore, minor positive effects are expected against IIA1, IIA11 and IIA12 in relation to these policies.

6.119 Policy DM RE1: Character of the Green Belt and open countryside sets out the Council's approach to preventing inappropriate development within or in close proximity to the Green Belt. As such, this policy is likely to restrict the delivery of housing in certain parts of the Borough, with a minor negative effect expected against **IIA3: Housing** in relation to this policy.

6.120 Policy DM RE1: Character of the Green Belt and open countryside seeks to ensure that new development within or in close proximity to the Green Belt enhances the blue and green infrastructure network through better connectivity and the creation of new publicly accessible open spaces, as well as complementing and improving the quality of existing open spaces. As such, a minor positive effect is expected against **IIA4: Health and wellbeing** in relation to this Policy.

6.121 Policy DM RE2: Improving access to the countryside and green corridors will support new development which will improve public access to key attractions such as the Lee Valley Regional Park, Enfield Chase, Forty Hall, Capel Manor and Chingford Reservoirs, as well as creating interconnected routes into the open countryside to facilitate the creation of a major green corridor from Lee Valley Regional Park to Enfield Chase (London National Park City designation), and to open spaces along the length of the river corridors including the River Lee Navigation, New River Path and Green Loop. The policy will also support enhancements to the green chain route on behalf of cyclists and pedestrians, thereby facilitating access to green spaces and encouraging active recreation. As such, significant positive effects are expected against **IIA4: Health and wellbeing** and **IIA5: Services and facilities**, while a minor positive effect is expected against **IIA6: Social inclusion** in relation to this policy. Policy SP RE3: Supporting the rural economy will seek to prevent the loss of leisure development, thereby protecting local amenity and recreational facilities. As such, minor positive effects are expected against **IIA4: Health and wellbeing** and **IIA5: Social inclusion** in relation to this policy.

6.122 Policy DM RE4: Farm and agricultural diversification outlines the Council's approach to agricultural land uses and will support proposals involving a change of use from agriculture to other business uses and sport and recreation activities, subject to certain criteria being met. By supporting the provision of outdoor and indoor sport and leisure development, the policy is likely to improve access to these services and facilities, with beneficial effects on the physical health and mental wellbeing of the population. Policy DM RE4 will also support proposals which promote sustainable agriculture and public participation in food growing, particularly those that contribute to education, training and the development of local supply chains. Therefore, minor

positive effects are expected against **IIA4: Health and wellbeing**, **IIA5: Services and facilities** and **IIA6: Social inclusion** in relation to Policy DM RE5.

6.123 Policy DM RE2: Improving access to the countryside and green corridors seeks to ensure that walking and cycling routes in the Borough meet the needs of different users. As such, minor positive effects are expected against **IIA8: Road safety** in relation to this policy. In addition, Policy SP RE3: Supporting the rural economy will seek to ensure that development proposals in rural areas provide safe access to the highway network, resulting in a minor positive effect against IIA8.

6.124 Policy DM RE1: Character of the Green Belt and open countryside sets out the Council's approach to preventing inappropriate development within or in close proximity to the Green Belt. As such, this policy is also likely to restrict the delivery of employment development in certain parts of the Borough, with a minor negative effect expected against IIA9 in relation to this policy. Policy SP RE3: Supporting the rural economy will support proposals which seek to improve the balance of jobs in rural areas and diversify the rural economy, as well as supporting the expansion of existing employment sites to encourage new business and local employment. The policy will also seek to improve internet connectivity for rural communities, enabling further economic development in these areas. As such, a significant positive effect is expected against IIA9 in relation to this policy.

6.125 Policy DM RE1: Character of the Green Belt and open countryside seeks to ensure that development within or in close proximity to the Green Belt conserves nature and contributes to environmental improvements in the Borough through the establishment and extension of the Borough's greenways network and green corridors as well as the provision of trees along transport routes where possible. The policy also states that development will be expected to provide environmental enhancements within the London National Park City designation where feasible. Policy DM RE2: Improving access to the countryside and green corridors will support development proposals that protect and enhance green and open spaces in the Borough and improve interconnection between these spaces, thereby protecting biodiversity and delivering biodiversity enhancements by promoting the creation of ecological networks. As such, minor positive effects are expected against **IIA13: Biodiversity** in relation to these policies.

6.126 Policy DM RE4: Farm and agricultural diversification seeks to ensure that there is no detrimental impact on historic features as a result of development and will therefore contribute towards the protection and conservation of heritage assets in the Borough. The policy also seeks to ensure that there is no detrimental impact on nature conservation or wildlife habitats and seeks to ensure that proposals contribute to regeneration and strategic objectives such as re-wilding, culture and tourism. As such, minor positive effects are expected against **IIA13: Biodiversity** and **IIA14: Historic environment**. In addition, Policy DM RE4 states that the proposals involving a change of use from agriculture will be supported where adequate landscaping and screening is provided to minimise any visual impacts. As such, the policy will contribute towards the protection and enhancement of the local landscape and a minor positive effect is expected against **IIA15: Landscape and townscape**.

6.127 Policy DM RE1: Character of the Green Belt and open countryside seeks to ensure that new development within or in close proximity to the Green Belt conserves the historic value of blue and green infrastructure in Enfield. As such, a minor positive effect is expected against **IIA14: Historic environment** in relation to this policy. Policy DM RE2: Improving access to the countryside and green corridors will support development which provides or enhances way-finding across the Borough's network of walking and cycling routes, including heritage trails and discovery walks. Therefore, the policy is likely to result in a minor positive effect against **IIA14: Historic environment**.

6.128 Policy DM RE1: Character of the Green Belt and open countryside will ensure that new development conserves the surrounding landscape and character of the area. The policy includes measures to ensure that development does not have a detrimental impact on the visual amenity of the landscape and Green Belt and retains a clear distinction between the Green Belt and the edge of the urban area. As such, Policy DM RE1 is expected to have a significant positive effect against **IIA15: Landscape and townscape**. Policy DM RE2: Improving access to the countryside and green corridors will promote development that improves public access to key attractions and the connections between them, including links to important viewing points. As such, Policy DM RE2 is expected to have a minor positive effect against IIA15.

6.129 Policy SP RE3: Supporting the rural economy will seek to prevent the development of incongruous or isolated new buildings and therefore will ensure that development respects the local surroundings and landscape character. As such, a minor positive effect is expected against IIA15 in relation to this policy.

6.130 Policy SP RE1: Development in the Green Belt seeks to ensure that development is directed towards previously developed land and will therefore contribute to the efficient use of land in Enfield. As such, a minor positive effect is expected

against **IIA16: Efficient use of land and materials**. Policy SP RE3: Supporting the rural economy will support proposals for the reuse of buildings for employment uses, resulting in a minor positive effect against IIA16.

6.131 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA7: Crime and community safety, IIA10: Town and local centres, IIA17: Flooding and IIA18: Water.

12. Culture, leisure and recreation

6.132 The likely sustainability effects of the culture, leisure and recreation policies in Chapter 12 of the Enfield Local Plan are set out in **Table 6.13** and described below the table.

Table 6.13: IIA findings for the culture, leisure and recreation policies

IIA objective	SP CL1: Promoting culture and creativity	DM CL2: Leisure and tourism	DM CL3: Visitor accommodation	SP CL4: Promoting sporting excellence	DM CL5: Sport, open space and recreation	DM CL6: Protecting and attracting public houses
IIA1: Climate change mitigation	0	0	+	+	+	0
IIA2: Climate change adaptation	0	0	0	+	0	0
IIA3: Housing	0	0	+	0	0	0
IIA4: Health and wellbeing	0	+	+	++	++	0
IIA5: Services and facilities	+	0	0	+	++	++
IIA6: Social inclusion	+	+	0	++	++	++
IIA7: Crime and community safety	0	0	+	0	0	0
IIA8: Road safety	0	0	+	0	0	0
IIA9: Economy	+	++	++	+	0	0
IIA10: Town and local centres	++	++	0	0	0	++
IIA11: Air pollution	0	0	+	+	+	++
IIA12: Sustainable transport	0	0	+	+	+	0
IIA13: Biodiversity	0	+	0	+	+	0
IIA14: Historic environment	0	0	0	+	0	+
IIA15: Landscape and townscape	0	+	+	+	0	0
IIA16: Efficient use of land and materials	0	+	+	0	0	0
IIA17: Flooding	0	0	0	0	+	0
IIA18: Water	0	+	0	0	0	0

6.133 Policies DM CL3: Visitor accommodation and DM CL5: Sport, open space and recreation are expected to have minor positive effects in relation to **IIA1: Climate change mitigation** as they will promote walking, cycling and the use of public transport, which is expected to reduce CO₂ emissions associated with the car. Policy SP CL4: Promoting sporting excellence is also expected to have a minor positive effect against this objective, as it will seek to encourage the use of public transport options.

6.134 Policy SP CL4: Promoting sporting excellence will support the development of sports, recreation and leisure facilities, provided that associated landscaping includes provisions to promote climate change resilience. As such, a minor positive effect is expected against **IIA2: Climate change adaptation** in relation to this Policy.

6.135 Policy DM CL3: Visitor accommodation is expected to have a minor positive effect in relation to **IIA3: Housing** because it seeks to avoid the loss of residential development in town centre locations within the Borough.

6.136 Policy DM CL2: Leisure and tourism will support proposals that increase the contribution that tourism, arts and cultural heritage and sport make to the quality of life and social well-being of the Borough's residents. Policy DM CL2 will also seek to promote greater use of rural parts of Enfield and the Lee Valley as a leisure and recreational resource, without harming biodiversity or water quality. Therefore, the policy is likely to result in improved access to such facilities and is expected to result in minor positive effects against **IIA4: Health and wellbeing** and **IIA6: Social inclusion**, as well as **IIA13: Biodiversity** and **IIA18: Water**.

6.137 Policy CL4: Promoting sporting excellence will support proposals which contribute to the objectives of the Enfield Health and Well Being Strategy, including the provision of publicly accessible sport and leisure facilities within public parks and a hierarchy of priority locations comprised of Tottenham Hotspur's training centre, Picketts Lock/Lee Valley Leisure Centre, Enfield Playing Fields and Firs Farm. Policy SP CL4 will also seek to support development proposals that deliver community access and education improvements to all sectors of the community. As such, this policy is likely to address the deficiency of open space in the Borough, resulting in significant positive effects against **IIA4: Health and wellbeing**, **IIA5: Services and facilities** and **IIA6: Social inclusion**.

6.138 Policy DM CL3: Visitor accommodation is also expected to have a minor positive effect in relation to **IIA4: Health and wellbeing** because it seeks to maximise pedestrian linkages and opportunities for walking and cycling. Policy DM CL5: Sport and recreation is expected to have significant positive effects against IIA4, **IIA5: Services and facilities** and **IIA6: Social inclusion**, as it will support the creation and enhancement of sports facilities where a need has been identified and resist the loss of sports and recreational buildings and land, thereby encouraging more active and healthy lifestyles. The policy will also seek to ensure improvements to open space provision, the deficiency of which has been identified as a key sustainability issue in Enfield. Furthermore, Policy DM CL5 will also seek to ensure that the development of artificial pitches do not have an adverse impact on the amenity of local residents in terms of noise and light pollution.

6.139 Policy DM CL6: Protecting and attracting public houses sets out the Council's approach to the conservation and provision of public houses in the Borough and will seek to ensure that they are protected for their important community, social and economic role in local communities, with a presumption in favour of the retention of public houses and bars in Enfield. As such, the policy is likely to maintain and improve access to such community services and encourage social inclusion, resulting in a significant positive effect against **IIA5: Services and facilities** and a minor positive effect against **IIA6: Social inclusion**.

6.140 Policy SP CL1: Promoting culture and creativity is expected to have a minor positive effect in relation to **IIA5: Services and facilities** as it seeks to provide good access to a competitive range of services and facilities in the Borough, including community facilities. In addition, this policy is likely to create a more attractive public realm as it supports the provision of cultural infrastructure, new entertainment uses and public art installations. As such, a minor positive effect is expected against **IIA6: Social inclusion**. SP CL4

6.141 Policy DM CL3: Visitor accommodation is expected to have minor positive effects in relation to **IIA7: Crime and community safety**. This is because Policy DM CL3 states that proposals must provide active frontages to the public realm, particularly in town centre locations, which is likely to improve safety through 'eyes on the street'. In addition, this policy will seek to ensure that drop off and pick up arrangements appropriate to the size and location of the accommodation are provided within proposals for visitor accommodation. Therefore, a minor positive effect is expected against **IIA8: Road safety** in relation to this policy.

6.142 A significant positive effect is expected against **IIA9: Economy** in relation to Policy DM CL2: Leisure and tourism while a minor positive effect is expected in relation to Policy SP CL1: Promoting culture and creativity. Policy SP CL1 will promote

economic growth in the Borough through the provision of cultural infrastructure and creative workspace, particularly within the Borough's regeneration areas, such as Meridian Water, public housing estates and town centres, and will support creative industry uses in Strategic Industrial Locations and Locally Significant Industrial Sites, at the same time as protecting and enhancing locations for cultural activities, including the arts, which tend to be centred around the town and local centres. Similarly, Policy DM CL2 will support the provision of visitor attractions, accommodation and facilities for tourism and business, and the prevention of the loss of existing visitor, leisure and cultural attractions, particularly within main town centres. As such, significant positive effects are expected against **IIA10: Town and local centres** in relation to policies SP CL1 and DM CL2. Policy DM CL3: Visitor accommodation is expected to have a significant positive effect in relation to **IIA9: Economy**, as it seeks to prevent the loss of important facilities for the visitor economy, including visitor accommodation, and promotes the provision of visitor accommodation in the Borough which would have beneficial effects on the local tourism industry. In addition, Policy SP CL4: Promoting sporting excellence seeks to expand and improve the provision of sport and leisure facilities in Enfield, which is likely to attract visitors to the Borough and provide benefits to the tourism industry and other commercial activity. As such, a minor positive effect is expected against IIA9 in relation to Policy SP CL4: Promoting sporting excellence.

6.143 Policy DM CL6: Protecting and attracting public houses will ensure that the loss of public houses and their associated economic value is avoided and will result in the refusal of proposals which affect the operational and ancillary amenity space of a public house. The policy will also encourage proposals involving new public houses within town centre locations in order to promote the evening and night-time economy, thereby maintaining the vitality and vibrancy of the Borough's centres. As such, significant positive effects are expected against **IIA9: Economy** and **IIA10: Town and local centres**.

6.144 Policy DM CL3: Visitor accommodation will promote walking and cycling, in addition to use of public transport. Therefore, the policy will promote a modal shift away from the private car, which would reduce vehicular emissions and thus improve air quality. For this reason, the policy is expected to have minor positive effects in relation to **IIA11: Air quality** and **IIA12: Sustainable transport**. Policy SP CL4: Promoting sporting excellence will seek to ensure that the development of sports, recreation and leisure facilities includes improvements to the site's connectivity with the surrounding public transport network and supports opportunities to improve public transport and active travel connections from Enfield's sport and physical health facilities to residential areas and open spaces in line with the Playing Pitch Strategy and Blue and Green Strategy. In addition, Policy DM CL5: Sport, open space and recreation will seek to ensure that developments which enhance or provide open space, sport and leisure provision are well-connected to public transport and facilitate pedestrian and cycle movement. As such, minor positive effects are also expected against IIA11 and IIA12 in relation to policies SP CL4 and DM CL5.

6.145 Policy SP CL4: Promoting sporting excellence will support the development of sports, recreation and leisure facilities provided that associated landscaping includes provisions to promote biodiversity, in addition to preserving and enhancing existing watercourses, ponds, trees and other biodiversity features. As such, a minor positive effect is expected against **IIA13: Biodiversity** in relation to this policy. In addition, Policy DM CL5: Sport, open space and recreation requires proposals to 'enhance the biodiversity of the site, contributing to the objectives identified in the Enfield Biodiversity Action Plan'. Therefore, a minor positive effect is also expected against IIA13 in relation to this Policy.

6.146 Policy SP CL4: Promoting sporting excellence will seek to ensure that the development of sports, recreation and leisure facilities does not result in unacceptable visual and landscaping impacts and protects important views and gaps such as those from Forty Hall Conservation Area. The policy will also seek to preserve and enhance parts of the Registered Parks and Gardens of Myddleton Hall as well as the local heritage assets of Myddleton and Whitewebbs Park. As such, minor positive effects are expected against **IIA14: Historic environment** and **IIA15: Landscape and townscape**.

6.147 Policy DM CL6: Protecting and attracting public houses sets out the Council's approach to the conservation and provision of public houses in the Borough and will seek to ensure that the appearance and character of public house buildings, including any features of historic or cultural significance, are not adversely affected. As such, a minor positive effect is expected against **IIA14: Historic environment** in relation to Policy DM CL6.

6.148 Policy DM CL2: Leisure and tourism will support proposals for tourism and leisure developments that benefit businesses, communities and visitors in rural areas provided that they respect the size, character and function of their setting. As such, a minor positive effect is expected against **IIA15: Landscape and townscape** in relation to Policy DM CL2. In addition, Policy DM CL3: Visitor accommodation will support proposals which protect and deliver growth for the visitor economy provided that they meet certain criteria such as being proportionate to their location in terms of size, scale and function. The policy states that proposals will be supported where they are sympathetic to the character of the area, but also able to create new places which

reflect current times and needs and which are fit for purpose. Therefore, the policy is likely to ensure that the local landscape and townscape is protected, resulting in a minor positive effect against IIA15.

6.149 Policy DM CL2: Leisure and tourism will also support the re-use of suitable rural buildings for visitor accommodation and other small scale rural development, resulting in a minor positive effect against **IIA16: Efficient use of land and materials**. In addition, Policy DM CL3: Visitor accommodation will support proposals for the conversion of existing buildings to accommodate visitors in the rural parts of Enfield, particularly within Enfield Chase. As such, a minor positive effect is also expected against IIA16 in relation to Policy DM CL3.

6.150 A minor positive effect is expected against **IIA17: Flooding** in relation to Policy DM CL5: Sport, open space and recreation as it will seek to ensure that developments for the provision of open space, sport and leisure integrate sustainable urban drainage systems into the design and layout.

6.151 The IIA findings for the sites allocated under Policy SP CL4: Promoting sporting excellence are summarised in **Table 6.14** overleaf.

Table 6.14: IIA findings for the sites allocated under Policy SP CL4: Promoting sporting excellence

Site	Size	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
Policy SP CL4: Promoting sporting excellence																			
SA56: Picketts Lock/Lee Valley Leisure Centre (leisure uses site)	6.51	0	0	0	++	0	+	0	0	0	0	-?	+	--?	0?	--?	--	-	0
SA62: Tottenham Hotspur's training centre (sport and recreation site)	44.16	0	0	0	++	0	0	0	0	0	0	--?	+/-	--?	-?	-?	--?	--	0

13. Movement and connectivity

6.152 The likely sustainability effects of the movement and connectivity policies in Chapter 13 of the Enfield Local Plan are set out in **Table 6.15** and described below the table.

Table 6.15: IIA findings for the movement and connectivity policies

IIA objective	SP T1: Promoting sustainable transport	DM T2: Making active travel the natural choice
IIA1: Climate change mitigation	++	++
IIA2: Climate change adaptation	0	0
IIA3: Housing	0	0
IIA4: Health and wellbeing	+	+
IIA5: Services and facilities	0	0
IIA6: Social inclusion	+	+
IIA7: Crime and community safety	0	0
IIA8: Road safety	++	++
IIA9: Economy	0	0
IIA10: Town and local centres	0	0
IIA11: Air pollution	++	++
IIA12: Sustainable transport	++	++
IIA13: Biodiversity	0	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	0	0
IIA16: Efficient use of land and materials	0	0
IIA17: Flooding	0	0
IIA18: Water	0	0

6.153 Policy SP T1: Promoting sustainable transport is expected to have a significant positive effect in relation to **IIA1: Climate change mitigation** because the policy promotes car free or low level of parking provision schemes in the Borough, which will be supported by further development of local public transport networks and sustainable modes of travel such as well-designed public realm walking and cycling routes including green chains and links. Similarly, Policy DM T2: Making active travel the natural choice is expected to have a significant positive effect in relation to this objective because it seeks to improve the

pedestrian and cycling environment by creating low traffic neighbourhoods within the Borough. Policies SP T1 and DM T2 therefore seek to reduce reliance on the private car, which will in turn help minimise CO₂ emissions.

6.154 Policies SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice are both anticipated to have minor positive effects in relation to **IIA4: Health and wellbeing** as both policies encourage physical exercise through walking and cycling, which has beneficial effects on people's health. Improved air quality through encouraging sustainable transport use will also benefit public health.

6.155 Policy SP T1: Promoting sustainable transport promotes sustainable transport and therefore the inclusion of those who may not have access to a car, whilst Policy DM T2: Making active travel the natural choice states that all development in the Borough should support the Healthy Streets approach. Adhering to the healthy streets approach would result in improvements to the public realm, fostering an improved environment for social interaction in the local community.

6.156 Significant positive effects are expected against **IIA8: Road safety** with respect to Policies SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice because they seek to reduce volume of cars on the roads which is likely to improve pedestrian safety. Policy SP T1: Promoting sustainable transport seeks to make improvements to active travel and public transport by improving safety through well-designed walking and cycling routes. These policies will therefore also contribute to a reduction in the number of vehicles on the road, increasing the safety of roads for pedestrians.

6.157 Policies SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice are expected to have significant positive effects in relation to **IIA11: Air pollution** and **IIA12: Sustainable transport** because they encourage walking and cycling, in addition to public transport, over use of the private car through upgrades to the public transport system. As a result, this is likely to help minimise air pollution. In particular, Policy SP T1 will improve sustainable transport throughout the Borough and to other parts of London and beyond, including Hertfordshire and Essex, in line with the objectives of the Mayor's transport Strategy and Enfield Transport Plan.

6.158 Negligible effects are expected in relation to IIA2: Climate change mitigation, IIA3: Housing, IIA5: Services and facilities, IIA7: Crime and community safety, IIA9: Economy, IIA10: Town and local centres, IIA13: Biodiversity, IIA14: Historic environment, IIA15: Landscape and townscape, IIA16: Efficient use of land and materials, IIA17: Flooding and IIA18: Water.

14. Environmental protection

6.159 The likely sustainability effects of the environmental protection policy in Chapter 14 of the Enfield Local Plan are set out in **Table 6.16** and described below the table.

Table 6.16: IIA findings for the environmental protection policy

IIA objective	SP ENV1: Local environmental protection
IIA1: Climate change mitigation	0
IIA2: Climate change adaptation	0
IIA3: Housing	0
IIA4: Health and wellbeing	++
IIA5: Services and facilities	0
IIA6: Social inclusion	0

IIA objective	SP ENV1: Local environmental protection
IIA7: Crime and community safety	0
IIA8: Road safety	0
IIA9: Economy	0
IIA10: Town and local centres	0
IIA11: Air pollution	++
IIA12: Sustainable transport	0
IIA13: Biodiversity	+
IIA14: Historic environment	0
IIA15: Landscape and townscape	0
IIA16: Efficient use of land and materials	0
IIA17: Flooding	0
IIA18: Water	+

6.160 Policy SP ENV1: Local Environmental Protection aims to ensure that new development contributes to the health and wellbeing of existing and future occupiers by mitigating the adverse effects of nuisance generating impacts including air, noise and vibration, and light pollution, as well as harm to human health and the environment from land contamination or instability. The policy will also require risk assessments to accompany the development and proposals for waste facilities to mitigate their impact on amenity, noise and other relevant environmental considerations. The policy will therefore protect the amenity of residents, and a significant positive effect is expected against **IIA4: Health and wellbeing**.

6.161 Policy SP ENV1: Local Environmental Protection sets out the Council's approach to directly address air quality in the Borough, which has been identified as a key sustainability issue for Enfield. The policy requires that all major development must be at least air quality neutral, and that all development in the Air Quality Focus Areas, as identified in the Enfield Air Quality Action Plan, are accompanied by air quality assessments. Therefore, the policy is expected to have a significant positive effect in relation to **IIA11: Air pollution**.

6.162 Policy SP ENV1: Local Environmental Protection will also seek to minimise and provide protection from unacceptable impacts caused by light pollution on the amenity of nearby habitats, biodiversity and the ecology of watercourses. Other measures in the policy will also benefit biodiversity, such as measures to avoid vibration or noise pollution, which could otherwise adversely affect certain species. As such, this policy is likely to result in a minor positive effect against **IIA13: Biodiversity**.

6.163 Policy SP ENV1: Local Environmental Protection will ensure that proposals for new development that would adversely affect the water quality of the water catchment, groundwater or surface water, including waterways, Source protection Zones (SPZ) or aquifers, are refused. The policy will also seek to prevent pollution caused by run off through sustainable drainage and other pollution prevention methods. As such, Policy SP ENV1: Local Environmental Protection is expected to have a minor positive effect against **IIA18: Water**.

6.164 Negligible effects are expected in relation to IIA1: Climate change mitigation, IIA2: Climate change adaptation, IIA3: Housing, IIA5: Services and facilities, IIA6: Social inclusion, IIA7: Crime and community safety, IIA8: Road safety, IIA9: Economy, IIA10: Town and local centres, IIA12: Sustainable transport, IIA14: Historic environment, IIA15: Landscape and townscape, IIA16: Efficient use of land and materials and IIA17: Flooding.

15. Delivering and monitoring

6.165 The likely sustainability effects of the delivering and monitoring policies in Chapter 15 of the Enfield Local Plan are set out in **Table 6.17** and described below the table.

Table 6.17: IIA findings for the delivering and monitoring policies

IIA objective	SP D1: Securing contributions to mitigate the impact of development	DM D2: Masterplans to achieve comprehensive development	DM D3: Infrastructure and phasing	DM D4: Monitoring and review
IIA1: Climate change mitigation	+	0	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Housing	+	0	0	++
IIA4: Health and wellbeing	+	+	+	0
IIA5: Services and facilities	+	0	+	0
IIA6: Social inclusion	0	+	0	0
IIA7: Crime and community safety	0	0	0	0
IIA8: Road safety	++	0	+	0
IIA9: Economy	+	+	0	++
IIA10: Town and local centres	0	0	0	0
IIA11: Air pollution	+?/-?	0	0	0
IIA12: Sustainable transport	+?/-?	0	+	0
IIA13: Biodiversity	0	0	0	0
IIA14: Historic environment	+	0	0	0
IIA15: Landscape and townscape	+	0	0	0
IIA16: Efficient use of land and materials	0	0	0	0
IIA17: Flooding	+?	0	0	0
IIA18: Water	+?	0	0	0

6.166 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA1: Climate change mitigation**, as it requires new development proposals to pay contributions to priorities such as tackling climate change.

6.167 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA3: Housing** because new development proposals are required to pay affordable housing contributions, which would increase the provision of affordable housing in the Borough. In addition, Policy DM D4: Monitoring and review outlines the Council's approach to monitoring the implementation of policies and proposals set out in the Local Plan and states that where monitoring indicates that the delivery of housing is falling short of the targets set out in the Plan, the Council will take action to assist in the delivery of sites and associated infrastructure including the direct provision of new housing. Therefore, a significant positive effect is expected against IIA3 in relation to this policy.

6.168 A minor positive effect is expected against **IIA4: Health and wellbeing** for Policy SP D1: Securing contributions to mitigate the impact of development as the policy seeks contributions in new developments for healthcare facilities and services.

6.169 Policy DM D3: Infrastructure and phasing will seek to ensure that proposals demonstrate that sufficient infrastructure capacity exists or will be made available to support the development over its lifetime. Depending on what types of infrastructure is affected by the policy, this may include healthcare facilities, and so an uncertain minor positive effect is expected in relation to **IIA4: Health and wellbeing**.

6.170 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to this objective because it seeks development contributions for the provision of healthcare facilities and services within the Borough. As such, a minor positive effect is expected against **IIA5: Services and facilities** in relation to this Policy. Policy DM D3: Infrastructure and phasing will ensure that development proposals demonstrate that sufficient infrastructure capacity exists in Enfield or will be made available to support the development in line with the priorities and phasing requirements outlined in the Infrastructure Delivery Plan. As such, this policy will ensure that infrastructure in the Borough does not become overburdened as a result of new development. Therefore, a minor positive effect is expected against IIA5 in relation to Policy DM D3.

6.171 Policy DM D2: Masterplans to achieve comprehensive development requires applicants to engage and consult with the local community. Therefore, this policy is likely to reduce social exclusion within the Borough, resulting in a minor positive effect against **IIA6: Social inclusion**. A significant positive effect is expected against **IIA8: Road safety** in relation to Policy SP D1: Securing contributions to mitigate the impact of development because it supports highway improvements with reference to healthy streets. In addition, Policy DM D3: Infrastructure and phasing will ensure that road infrastructure is phased appropriately with associated development. Therefore, this policy is likely to help in avoiding road safety becoming an issue, resulting in a minor positive effect against IIA8.

6.172 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA9: Economy** because the policy seeks to secure contributions from the Enfield community infrastructure levy to support training, skills and job brokerage, which will improve the employment prospects of local communities in the Borough. Policy DM D2: Masterplans to achieve comprehensive development will seek to ensure that proposals are accompanied by a masterplan where they form all or part of a site allocation, which must demonstrate that the proposal does not compromise the delivery of the site allocation or prejudice the development of adjoining land. As such, this policy is likely to ensure that proposals are considerate of future development and will encourage sustainable growth and investment in the Borough, resulting in a minor positive effect against IIA9. Policy DM D4: Monitoring and review states that where monitoring indicates that the delivery of employment growth in the Borough is falling short of the targets set out in the Plan, the Council will take action to assist in the delivery of sites and associated infrastructure including the direct provision of employment uses. As such, a significant positive effect is also expected against IIA9 in relation to Policy DM D4.

6.173 Policy SP D1: Securing contributions to mitigate the impact of development could have mixed (minor positive and minor negative) effects in relation to **IIA11: Air pollution** and **IIA12: Sustainable transport**, although these effects are uncertain, because although the policy prioritises public transport use it also proposes highway improvements which could increase cars on the road. However, highway improvements could also have the effect of reducing traffic congestion and therefore minimising air pollution.

6.174 Policy DM D3: Infrastructure and phasing will seek to ensure that proposals demonstrate that sufficient infrastructure capacity exists or will be made available to support the development over its lifetime. Depending on what types of infrastructure

is affected by the policy, this may include sustainable transport infrastructure such as public transport services, and so an uncertain minor positive effect is expected in relation to **IIA12: Sustainable transport**.

6.175 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA14: Historic Environment** as it seeks to secure contributions to help preserve heritage at risk within the Borough.

6.176 Policy SP D1: Securing contributions to mitigate the impact of development is expected to have a minor positive effect in relation to **IIA15: Landscape and townscape**, as it supports the development of parks and open spaces, which will also help protect and enhance the landscape.

6.177 Policy SP D1: Securing contributions to mitigate the impact of development could have minor positive effects against **IIA17: Flooding** and **IIA18: Water**, although these are uncertain, because it states that development proposals must include provision for site specific mitigation (e.g. sustainable drainage systems). The effect is uncertain because SuDS are simply given as an example; there is no assurance that managing flood risk will be a priority in the policy.

6.178 Negligible effects are expected in relation to IIA2: Climate change adaptation, IIA7: Crime and community safety, IIA10: Town and local centres, IIA13: Biodiversity, and IIA16: Efficient use of land and materials.

Chapter 7

Cumulative effects

7.1 This chapter summarises the likely cumulative effects of the Local Plan vision, strategic objectives, policies and site allocations on each of the IIA objectives in Enfield's IIA framework, as illustrated in **Tables 7.1 to 7.4**. These tables use the same symbols and colour coding to represent sustainability effects as shown in **Figure 2.2**. At this stage in the plan preparation the cumulative effects assessment attempts to consider the total effect of the preferred policy and spatial approaches set out in the Enfield Local Plan: Main Issues and Preferred Approaches document. Once the plan is more certain, at the Regulation 19 stage, it will be possible to highlight any areas or locations where particular effects may accumulate, and also to consider the potential for cumulative effects of the Enfield Local Plan in combination with other neighbouring plans.

7.2 The IIA work so far has highlighted the potential for some cumulative effects to be felt across the Borough due to the large-scale development proposed in a range of locations (e.g. potential increases in air pollution). Conversely, some of the cumulative effects, both positive (e.g. for social inclusion, local economy or health and wellbeing) and negative (e.g. for historic environment or biodiversity) may be concentrated in particular locations within the Borough where a cluster of new growth/intensification locations occurs, e.g. in the south east around Edmonton Green, Meridian Water and Angel Edmonton, or the centre of the Borough around Enfield Town and Southbury, or the new settlements at Chase Park and Crews Hill. However, this chapter also recognises the combined effects of all the plan policies working together, including a number of very strong policy requirements that are seeking to either enhance the benefits of new development or mitigate and avoid any potential adverse effects. **Table 7.5** at the end of the chapter provides a single overall cumulative effect of the Enfield Local Plan: Main Issues and Preferred Approaches document on each of the IIA objectives.

Table 7.1: Summary of cumulative IIA effects for vision, strategic objectives and all strategic and development management policies

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
2. Good Growth in Enfield																		
Vision	+?	0	+?	+?	+?	+?	0	0	+?	+?	+?	+?	+?	+?	+?	0	+?	+?
Strategic objective 1	0	0	++	0	0	+	0	0	+	0	0	0	0	0	0	0	0	0
Strategic objective 2	0	0	0	++	0	+	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 3	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 4	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 5	+	0	0	+	0	++	0	0	0	0	+	+	0	0	0	0	0	0
Strategic objective 6	+	0	0	0	0	0	0	0	0	0	+	++	0	0	0	0	0	0
Strategic objective 7	0	0	0	++	0	0	0	0	0	0	0	0	++	0	0	0	0	0
Strategic objective 8	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 9	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	+
Strategic objective 10	+	++	0	0	0	0	0	0	0	0	0	0	+	0	0	0	++	0
Strategic objective 11	0	0	0	++	0	0	0	0	0	0	0	0	++	0	0	0	+	0

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
Strategic objective 12	0	0	0	++	0	0	0	0	0	0	0	0	++	0	0	0	0	0
Strategic objective 13	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 14	-?	0	0	+	0	0	0	0	++	0	-?	0	0	0	0	0	0	0
Strategic objective 15	+	0	0	0	0	0	0	0	++	+	+	+	0	0	0	0	0	0
Strategic objective 16	0	0	0	0	+	+	0	0	+	++	0	0	0	0	0	0	0	0
Strategic objective 17	0	0	0	+	0	0	0	0	+	0	0	0	+	+	+	0	0	0
Strategic objective 18	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic objective 19	0	0	+	0	+	+	0	0	+	++	0	0	0	0	0	0	0	0
Strategic objective 20	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0
SP SS1: Spatial Strategy	++/- -	0	++	+	++	+	0	0	++	++	++/- -	++/--	+/-	-?	+/-?	++/-	0	+
SP SS2: Making good places	++/-	0	0	+	+	+	0	0	+	+	++/-	++/-	+	+	+	+	0	0
3. Place																		
SP PL1: Enfield Town	++/-	0	++	++	++?	+	+	+	++	++	--/+	++	+/-	+?/- ?	+?	++	-?	+/-

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
SP PL2: Southbury	++/-	0	++	++	++?	+	+	+	++	++	--/+	++	+	0?	++?	++	-?	-
SP PL3: Edmonton Green	++/-	+	++	++	++?	++	+	+	++	++	--/+	++	+	+?/- ?	+?	++	+/-	+/-
SP PL4: Angel Edmonton	++/-	0	++	++/- -?	++?	++	+	++	++	++	--/+	++	+/-	-?	+?	++	+/-	+/-
SP PL5: Meridian Water	++/- -	+	++	++	++	++	0	+	++	++	--/+	++/-	+	0?	+?	++	+/-	+/-
SP PL6: Southgate	++/-	0	++	++/-	+?	+	0	+	++	++	--/+	++	+	+?/- ?	++?	++	-	0
SP PL7: New Southgate	++/-	0	++	++	++?	++	+	+	+	+	--/+	++	+/-	-?	+?	++	-	+
SP PL8: Rural Enfield	++/-	+	0	++	+	+	0	+	++	0	++/-	+/-	++	+?	++	-?	+	+
SP PL9: Crews Hill	++/- -	+	++	++/-	++	+	0	+	++	0	--/+	++/-	+/-	+?/- ?	++?	+/-?	+/-	+
SP PL10: Chase Park	++/-	+	++	++	++	+	+	+	++	++	--/+	++	+/-	+?/- ?	+?	--?	+/-	+/-
4. Sustainable Enfield																		
SP SE1: Responding to the climate emergency	++	++	0	0	0	0	0	0	0	0	+	0	0	0	0	+	+	+

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
DM SE2: Sustainable design and construction	++	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DM SE3: Whole-life carbon and circular economy	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	+
DM SE4: Reducing energy demand	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DM SE5: Greenhouse gas emissions and low carbon energy supply	++	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0
DM SE6: Renewable energy development	++	0	0	+	0	0	0	0	0	0	0	0	+	+	+	0	0	
DM SE7: Climate change adaptation and managing heat risk	0	++	0	+	0	0	0	0	0	0	0	0	+	0	+	0	0	0
DM SE8: Managing flood risk	0	+	0	+	0	0	+	0	0	0	0	0	+	0	0	+	++	+
DM SE9: Protection and improvement of watercourses	0	+	0	0	0	0	0	0	0	0	0	0	+	0	0	0	+	++
DM SE10: Sustainable drainage systems	0	+	0	+	0	0	0	0	0	0	0	0	+	0	0	0	++	+
5. Addressing equality and improving health and wellbeing																		
SP SC1: Improving health and wellbeing of Enfield's diverse communities	+	0	0	++	++	++	0	+	0	0	+	+	++	0	0	0	0	0
SP SC2: Protecting and enhancing social and community infrastructure	+	0	+	+	++	++	+	0	+	+	+	+	0	0	0	0	0	0

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
6. Blue and green Enfield																		
SP BG1: Enfield's blue and green infrastructure network	++	+	0	++	+	+	0	+	0	+	+	++	++	+	++	0	+	++
SP BG2: Protecting nature conservation sites	0	0	0	+	0	0	0	0	0	0	0	0	++	0	0	0	0	+
SP BG3: Biodiversity net gain, rewilding and offsetting	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0	0
SP BG4: Green Belt and Metropolitan Open Land	0	0	-	0	0	0	0	0	-	0	0	0	+	+	++	+	0	0
SP BG5: Green Belt and edges of the countryside/urban areas	0	0	-	0	0	0	0	0	+/-	0	0	+	+	0	++	+	0	0
DM BG6: Protecting open space	0	0	0	++	0	+	0	0	0	0	0	0	+	+	+	0	+	+
DM BG7: Watercourses	0	0	0	+	0	+	0	0	0	0	0	0	+	0	+	0	0	+/-
DM BG8: Urban greening and biophilic principles	+	+	0	0	0	0	0	0	0	0	+	0	+	0	+	0	+	+
DM BG9: Allotments and community food production	0	0	0	+	0	+	0	0	0	0	0	0	+	0	+	+	0	0
DM BG10: Burial and crematorium spaces	0	0	0	- ?/+	0	0	0	0	0	0	+/-?	+/-	--?	0?	--	--	+	+?/- ?
DM BG11: Blue and green infrastructure plans	+	+	0	+	0	+	+	0	0	0	+	+	+	0	+	0	+	+
7. Design and character																		

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
SP DE1: Delivering a well-designed, high quality and resilient environment	++	+	0	+	+	+	+	++	+	0	+	++	++	+	++	+	0	0
DM DE2: Design process and Design Review Panel	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0
DM DE3: Inclusive design	0	0	0	+	0	++	0	0	0	0	0	0	0	+	0	0	0	0
SP DE4: Putting heritage at the centre of place making	0	0	0	0	0	+	0	0	0	0	0	0	0	++	+	0	0	0
DM DE5: Strategic and local views	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	0	0	0
DM DE6: Tall buildings	0	0	0	+	0	+	++	0	0	0	0	0	0	+	++	+	0	0
DM DE7: Creating liveable, inclusive and quality public realm	++	+	0	+	+	++	++	++	0	+	+	++	++	+	++	0	0	0
DM DE8: Design of business premises	+	+	0	+	0	+	+	+	++/-	0	+	+	+	+	+	+	0	0
DM DE9: Shopfronts and advertisement	+	0	0	0	0	0	+	0	-	+	0	0	0	+	++	0	0	0
DM DE10: Conserving and enhancing heritage assets	+	0	0	0	0	0	0	0	0	0	0	0	0	++	+	0	0	0
DM DE11: Landscape design	0	0	0	0	0	0	+	0	0	0	0	0	++	+	++	0	+	+
DM DE12: Civic and public developments	+	+	0	++?	++?	+	+	0	0	0	0	0	+	0	+	+	0	0
DM DE13: Housing standards and design	0	0	+	+	0	+	0	0	0	0	0	+	0	0	+	0	0	0

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
DM DE14: External amenity standards	0	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0
DM DE15: Residential extensions	0	0	-	+	0	0	0	0	0	0	0	0	0	+	+	0	0	0
8. Homes for all																		
SP H1: Housing development sites	+?/- ?	0	++	++/- -?	++	+	0	0	+	++	+?/- ?	++?/- -?	--?	-?	-?	++/- -?	-?	-?
SP H2: Affordable housing	0	0	++	+	0	++	0	0	+	0	0	0	0	0	0	0	0	0
DM H3: Housing mix and type	0	0	++	+	0	++	0	0	+	0	0	0	0	0	+	0	0	0
DM H4: Small sites and small housing development	0	0	++	+	+	0	0	0	+	+	+	+	0	0	+	++	0	0
DM H5: Supported and specialist housing	0	0	++	+	+	++	0	0	+	0	0	0	0	0	0	0	0	0
DM H6: Community led housing	0	0	++	+	0	++	0	0	+	0	0	0	0	0	0	0	0	0
DM H7: Build to rent	0	0	++	0	0	+	0	0	+	0	0	0	0	0	0	0	0	0
DM H8: Large scale purpose built shared housing	+	0	++	0	+	0	0	0	+	0	+	+	0	0	0	0	0	0
DM H9: Student accommodation	+	0	++	+	+	+	0	0	+	+	+	+	0	0	+	0	0	0
DM H10: Gypsy and Traveller accommodation	+	0	++	+	+	+	0	+	+	0	+	+	+	+	+	0	0	0

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
9. Economy																		
SP E1: Employment and growth	+/-?	0	++	++/- -?	++?	+	0	0	++	++	+/-?	++/- ?	--?	-?	-?	++/- -?	-?	-?
SP E2: Promoting jobs and inclusive business growth	+	0	0	+	+	+	0	0	++	++	+	+	0	0	0	+	0	0
SP E3: Protecting employment locations and managing change	+	0	0	0	0	0	0	0	++	0	+	+	0	0	0	0	0	0
SP E4: Supporting offices	+	0	0	0	0	0	0	0	++	++	+	+	0	0	0	+	0	0
SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites	+	0	0	+	0	0	0	0	++	0	+	+	+	0	+	++	+	+
DM E6: Redevelopment of non-designated industrial sites	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0
DM E7: Providing for workspaces	+	0	0	0	0	0	0	0	++	++	+	+	0	0	0	0	0	0
DM E8: Local jobs, skills and local procurement	0	0	0	0	+	+	0	0	++	0	0	0	0	0	0	0	0	0
DM E9: Fostering a successful evening and night-time economy	0	0	0	+	0	+	0	0	++	++	0	0	0	0	0	0	0	0
DM E10: Creating a smart and digitally connected Borough	+	0	0	+	0	0	0	0	++	0	+	0	0	0	0	0	0	0

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
10. Town centres and high streets																		
SP TC1: Promoting town centres	+	0	+	+	+	+	+	0	++	++	+	+	0	+	+	++	0	0
SP TC2: Encouraging vibrant and resilient town centres	+	0		0	+	0	+	0	++	++	+	+	+	+	+	++	0	0
DM TC3: Floorspace above commercial premises	+	0	+	+	+	0	0	0	++	++	+	+	0	0	0	++	0	0
DM TC4: Markets	0	0	0	+	0	0	0	0	+	+	0	0	0	0	+	0	0	0
DM TC5: Meanwhile uses	0	0	0	0	0	0	0	0	+	++	0	0	0	0	+	0	0	0
DM TC6: Managing clustering in town centres	0	0	0	+	0	+	0	0	+	+	0	0	0	0	+	0	0	0
11. Rural Enfield																		
DM RE1: Character of the Green Belt and open countryside	0	0	-	+	0	0	0	0	-	0	0	0	+	+	++	0	0	0
DM RE2: Improving access to the countryside and green corridors	+	0	0	++	++	+	0	+	0	0	++	++	0	+	0	0	0	0
SP RE3: Supporting the rural economy	+	0	0	+	+	0	0	+	++	0	+	+	0	0	+	+	0	0
DM RE4: Farm diversification and rural employment	+	0	0	+	+	+	0	0	0	0	+	+	+	+	+	0	0	0
12. Culture, leisure and recreation																		

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
SP CL1: Promoting culture and creativity	0	0	0	0	+	+	0	0	+	++	0	0	0	0	0	0	0	0
DM CL2: Leisure and tourism	0	0	0	+	0	+	0	0	++	++	0	0	+	0	+	+	0	+
DM CL3: Visitor accommodation	+	0	+	+	0	0	+	+	++	0	+	+	0	0	+	+	0	0
SP CL4: Promoting sporting excellence	+	+	0	++	+	++	0	0	+	0	+	+	+	+	+	0	0	0
DM CL5: Sport, open space and recreation	+	0	0	++	++	++	0	0	0	0	+	+	+	0	0	0	+	0
DM CL6: Protecting and attracting public houses	0	0	0	0	++	++	0	0	0	++	++	0	0	+	0	0	0	0
13. Movement and capacity																		
SP T1: Promoting sustainable transport	++	0	0	+	0	+	0	++	0	0	++	++	0	0	0	0	0	0
DM T2: Making active travel the natural choice	++	0	0	+	0	+	0	++	0	0	++	++	0	0	0	0	0	0
14. Environmental Protection																		
SP ENV1: Local environmental protection	0	0	0	++	0	0	0	0	0	0	++	0	+	0	0	0	0	+
15. Delivering and monitoring																		
SP D1: Securing contributions to mitigate the impact of development	+	0	+	+	+	0	0	++	+	0	+?/- ?	+?/- ?	0	+	+	0	+?	+?

Policy	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
DM D2: Masterplans to achieve comprehensive development	0	0	0	+	0	+	0	0	+	0	0	0	0	0	0	0	0	0
DM D3: Infrastructure and phasing	0	0	0	+	+	0	0	+	0	0	0	+	0	0	0	0	0	0
DM D4: Monitoring and review	0	0	++	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0

Table 7.2: Summary of cumulative IIA effects for the sites allocated under Policy SP H1: Housing development sites

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
Policy SP H1: Housing development sites																				
Enfield Town (SP PL1)																				
SA1: St Anne's Catholic High School for Girls (housing)	1.76	236	0	0	++	++	++?	0	0	0	-	+	--?	++	--?	-?	+?	+	--	--?
SA2: Palace Gardens Shopping Centre (mixed-use)	3.73	350	0	0	++	++	++?	0	0	0	+?/-	+	--?	++	--?	-?	+?	++	0	--?
SA3: 100 Church Street (housing)	0.28	56	0	0	+	++	++?	0	0	0	-	+	--?	++	--?	-?	+?	+	-	--?
SA4: Enfield Town Station and Former Enfield Arms, Genotin Road (mixed-use)	0.58	100	0	0	+	++	++?	0	0	0	-	+	-?	++	--?	-?	+?	+	--	--?
SA5: Enfield Civic Centre (mixed-use)	1.41	150	0	0	++	++	++?	0	0	0	+?/-	+	--?	++	--?	-?	-?	+	--	--?
SA6: Southbury Road Superstore Area (mixed-use)	1.74	350	0	0	++	++	++?	0	0	0	+?/-	+	--?	++	--?	-?	+?	+	--	--?
SA7: Oak House, 43 Baker Street (housing)	0.26	55	0	0	+	++	++?	0	0	0	-	+	--?	++	--?	-?	+?	+	-	--?
Southbury (SP PL2)																				

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
SA8: Sainsburys Baird Road (mixed-use)	3.90	1041 homes and 20685 sq.m	0	0	++	++	++?	+	0	0	++?	0	--?	++/-	0	--?	++?	++	0	0
SA9: Colosseum Retail Park (mixed-use)	4.35	1587	0	0	++	++	++?	+	0	0	++?	0	--?	++	0	--?	++?	++	--	0
SA10: Morrisons, Southbury Road (mixed-use)	2.69	892	0	0	++	++	++?	0	0	0	++?	0	--?	++	0	--?	++?	+	--	0
SA11: Southbury Leisure Park (mixed-use)	2.96	450	0	0	++	++/-	++?	+	0	0	++?/-	0	--?	++	--?	--?	++?	+	--	0
SA12: Tesco, Ponders End, 288 High Street (mixed-use)	2.78	350	0	0	++	++	++?	+	0	0	++?	+	--?	++	0	0?	++?	+	-	--?
Edmonton Green (SP PL3)																				
SA13: Edmonton Green Shopping Centre (mixed-use)	10.39	1173	0	0	++	++/-	++?	++	0	0	++?/-	+	--?	++	--?	--?	++?	++	--	--?
SA14: Chiswick Road Estate (Oswald and Newdales) (housing)	2.37	272	0	0	++	++/-	++?	+	0	0	-	+	--?	++	0	--?	++?	+	--	0
Angel Edmonton (SP PL4)																				

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
SA15: Joyce Avenue and Snells Park Estate (housing)	9.94	1217	0	0	++	++/-?	+?	0	0	0	++	+	-?	++	-?	-?	--	++	--	-?
SA16: Public House, 50-56 Fore Street (housing)	0.19	68	0	0	+	++	+?	+	0	0	-	+	-?	++	-?	-?	+?	+	--	-?
SA17: Upton Road and Raynham Road (housing)	1.92	198	0	0	++	++/-?	+?	+	0	0	-	+	-?	++	-?	-?	+?	+	--	-?
SA18: South east corner of North Middlesex University Hospital Trust of Sterling Way (housing site)	1.35	400	0	0	++	++	+?	0	0	0	++	0	-?	++	-?	-?	+?	+	--	0
Meridian Water (SP PL5)																				
SA19: IKEA store; Tesco Extra, 1 Glover Drive; Meridian Water, Willoughby Lane and Meridian Way (mixed-use)	36.94	5000	0	0	++	++/-?	+?	+	0	0	++?	+	-?	++	-?	-?	+?	++	--	-?
Southgate (SP PL6)																				
SA20: Asda Southgate, 130 Chase Side, Southgate (mixed-use)	1.66	165	0	0	++	-?	+?	0	0	0	+?/-	+	-?	++	-?	-?	+?	+	-	0
SA21: Southgate Office Village, 286 Chase Road (mixed-use)	0.55	125	0	0	++	++/-	+?	0	0	0	+?/-	+	-?	++	-?	-?	+?	+	--	0
SA22: M&S Food (mixed-use)	0.45	150	0	0	++	++/-	+?	0	0	0	+?/-	+	-?	++	-?	-?	+?	+	--	0

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water	
SA23: Minchenden Car Park and Alan Pullinger Centre (housing)	0.11	48	0	0	+	++/-	+?	0	0	0	-	+	-?	++	-?	-?	+?	+	0	0	
New Southgate (SP PL7)																					
SA24: Arnos Grove Station Car Park (housing)	1.08	162	0	0	++	++/-?	++?	0	0	0	-	+	-?	++	-?	-?	--	+	--	0	
SA25: Site between North Circular Road and Station Road (mixed-use)	1.13	230	0	0	++	++	+?	+	0	0	++?	0	-?	++/-	-?	-?	+?	+	--	0	
SA26: Station Road, New Southgate (mixed-use)	1.37	203	0	0	++	++	+?	+	0	0	++	0	-?	++/-	-?	0?	+?	+	--	0	
Crews Hill (SP PL9)																					
SA27: Land at Crews Hill (housing)	114.04	3000	0	0	++	++/-	+?	0	0	0	-	0	-?	++/-	-?	-?	--	+/+?	++/-	--	-?
Chase Park (SP PL10)																					
SA28: Land at Chase Park (housing)	118.02	3000	0	0	++	++	++?	0	0	0	-	+	-?	++	-?	-?	-?	-?	--	-?	
SA29: Arnold House (housing)	1.35	62	0	0	+	++/-	-?	0	0	0	-	0	-?	++/-	-?	0?	-?	-?	--	0	
Other proposed site allocations outside of the placemaking areas (urban areas)																					

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
SA30: Claverings, Centre Way (mixed-use)	2.42	587	0	0	++	++	++?	+	0	0	++?	0	-?	+	-?	0?	-?	++	--	-?
SA31: Cockfosters Station Car Park (Parcels a and b), Cockfosters Road, Barnet (housing)	1.37	316	0	0	++	++	+?	0	0	0	-	+	-?	++	--?	0?	-?	+	0	0
SA32: Sainsburys Green Lanes (mixed-use)	3.94	299 homes and 13325 sq.m	0	0	++	++/-?	++?	0	0	0	++/-	+	-?	++	--?	0?	+?	+	--	-?
SA33: Blackhorse Tower, Holbrook House and Churchwood House, 116 Cockfosters Road (housing)	1.25	200	0	0	++	++	+?	0	0	0	-	+	-?	++	--?	0?	+?	+	--	0
SA34: 241 Green Street (mixed-use)	0.45	92	0	0	++	++/-	+?	+	0	0	++?	+	-?	++	-?	0?	+?	+	--	-?
SA35: Land at former Wessex Hall Building (housing)	0.38	110	0	0	++	--?/+	+?	+	0	0	++	0	-?	++	--?	0?	--	+	--	-?
SA36: 188-200 Bowes Road (housing)	0.48	86	0	0	+	++	++?	0	0	0	-	+	--?	++	-?	0?	+?	+	--	-?
SA37: Main Avenue Site (housing)	4.49	82	0	0	+	++/-?	++?	+	0	0	-	+	--?	++	-?	-?	+?	++	--	0

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
SA38: Land at Ritz Parade (mixed-use)	0.65	79	0	0	+	++	++?	0	0	0	+/-	+	--?	++	--?	--?	+?	+	--	--?
SA39: Travis Perkins Palmers Green, Bridge Drive, Bloomfield Lane (mixed-use)	0.62	76 homes and 3200 sq.m	0	0	+	++/- --?	+?	0	0	0	+?/ -	+	--?	++	--?	0?	+?	+	--	--?
SA40: Land known as Brimsdown Sports Ground (mixed-use)	8.11	50	0	0	+	-- ?/+	+?	+	0	0	+?/ -	+	--?	++	--?	0?	+?	--	-	0
SA41: Albany Leisure Centre and Car Park, 55 Albany Road (housing)	0.63	30	0	0	+	++	+?	+	0	0	-	+	--?	++	0	0?	+?	+	--	--?
SA42: Fords Grove Car Park (housing)	0.24	24	0	0	+	++	++?	0	0	0	-	+	--?	++	--?	0?	+?	+	0	--?
SA43: Lodge Drive Car Park (incl. Depot) (housing)	0.67	50	0	0	+	++	+?	0	0	0	-	+	--?	++	--?	--?	+?	+	-	--?
Other proposed site allocations outside of the placemaking areas (outside urban areas)																				
SA44: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road (mixed-use)	4.07	270	0	0	++	++/- --?	++?	0	0	0	+?/ -	0	--?	++/ -	--?	0?	--?	--?	--	--?
SA45: Land between Camlet Way and Crescent Way, Hadley (housing)	11.05	160	0	0	++	++/- -	+?	0	0	0	-	+	--?	++/ --	--?	--?	--?	--?	-	--?

Table 7.3: Summary of cumulative IIA effects for the sites allocated under Policy SP E1: Employment and growth

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
Policy SP E1: Employment and growth																				
Southbury (SP PL2)																				
SA8: Sainsburys Baird Road (mixed-use)	3.90	1041 homes and 20685 sq.m	0	0	++	++	++?	+	0	0	++?	0	--?	++/-	0	--?	+	++	0	0
SA46: Crown Road Lorry Park (industrial)	0.71	4530 sq.m	0	0	0	0	0	+	0	0	+	0	--?	++	0	--?	+	+	--	0
Meridian Water (SP PL5)																				
SA47: Ravenside Retail Park (industrial)	4.00	21645 sq.m	0	0	0	0	0	+	0	0	+	0	--?	++/-	--?	0?	+	++	--	--?
Crews Hill (SP PL9)																				
SA48: Land at 135 Theobalds Park Road (industrial)	1.64	3251 sq.m	0	0	0	0	0	0	0	0	+	0	--?	++/-	--?	0?	+	+	--	0
Other sites outside of the placemaking areas																				
SA39: Travis Perkins Palmers Green, Bridge Drive, Bloomfield Lane (mixed-use)	0.62	76 homes and 3200 sq.m	0	0	+	++/-	++?	0	0	0	++/-	+	--?	++	--?	0?	+	+	--	--?

Site	Size	Yield	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and	IIA17: Flooding	IIA18: Water
SA49: Land to the south of Millmarsh Lane, Brimsdown Industrial Estate (industrial)	5.19	32500 sq.m	0	0	0	0	0	+	0	0	+	0	-?	++/-	-?	0?	+?	++	--	--?
SA32: Sainsburys Green Lanes (mixed-use)	3.94	299 homes and 13325 sq.m	0	0	++	++/-	++?	0	0	0	+?/-	+	-?	++	-?	0?	+?	+	--	--?
SA50: 6 Morson Road (industrial)	0.83	2600 sq.m	0	0	0	0	0	+	0	0	+	0	0	++/-	-?	0?	-?	+	-	--?
SA51: Montagu Ind Estate (industrial)	5.69	6613 sq.m	0	0	0	0	0	+	0	0	+	0	-?	++	-?	0?	+?	++	--	--?
SA30: Claverings, Centre Way (mixed-use)	2.42	587	0	0	++	++	++?	+	0	0	++?	0	-?	+	-?	0?	-?	++	--	--?
SA52: Land West of Ramney Marsh (industrial)	12.01	70200 sq.m	0	0	0	0	0	0	0	0	++	0	-?	++/-	-?	0?	+?	++	--	--?
SA53: Car Park Site, Wharf Road (industrial)	0.79	5115 sq.m	0	0	0	0	0	+	0	0	+	0	0	++/-	-?	0?	-?	+	--	--?
SA54: Land East of Junction 24 (industrial)	5.17	30550 sq.m	0	0	0	0	0	0	0	0	+	0	-?	--/+	-?	-?	-?	-?	--	--?
SA55: Land to the North West of Innova Park (industrial)	3.47	16445 sq.m	0	0	0	0	0	0	0	0	+	0	-?	++/-	-?	0?	+?	++	--	--?

Table 7.4: Summary of IIA cumulative effects for the sites allocated under Policy DM BG10: Burial and crematorium spaces and Policy SP CL4: Promoting sporting excellence

Site	Size	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Housing	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA8: Road safety	IIA9: Economy	IIA10: Town and local centres	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
Policy DM BG10: Burial and crematorium spaces																			
SA58: Alma Road Open Space (cemetery)	2.64	0	0	0	--?	0	0	0	0	0	0	-?	++/-	--?	0	0	0	-	--?
SA59: Firs Farm Recreation Ground (Part) (crematorium)	3.68	0	0	0	--?	0	0	0	0	0	0	--?	+	--?	0?	--	--	--	--?
SA60: Sloemans Farm (natural burial site)	47.46	0	0	0	0	0	0	0	0	0	0	-?	++/--	--?	0	0	0	-	--?
SA61: Church Street Recreation Ground (crematorium)	5.55	0	0	0	--?	0	0	0	0	0	0	--?	+	--?	0?	--	--	-	--?
Policy SP CL4: Promoting sporting excellence																			
SA56: Picketts Lock/Lee Valley Leisure Centre (leisure uses site)	6.51	0	0	0	++	0	+	0	0	0	0	-?	+	--?	0?	--?	--	-	0
SA62: Tottenham Hotspur's training centre (sport and recreation site)	44.16	0	0	0	++	0	0	0	0	0	0	--?	+/-	--?	-?	-?	--?	--	0

IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO2 emissions such that the Council will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040

7.3 The Local Plan includes a number of ambitious and aspirational policies seeking to mitigate climate change, particularly in the 'Sustainable Enfield' section but also within the vision and strategic objectives. Policies such as SP SE1: Responding to the climate emergency; DM SE5 Greenhouse gas emissions and low carbon energy supply and DM SE6: Renewable energy development set out wide ranging measures which will combine to help achieve IIA1. These policies require new development in Enfield to adhere to high standards of design and construction, and major developments will be required to be net-zero carbon. In terms of reducing emissions from transport sources, Local Plan policies SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice specifically aim to reduce car use and to encourage Enfield's residents to walk and cycle day to day. The Place policies also set out locally specific ways in which development will be required to facilitate and encourage modal shift, which will reduce transport-related emissions and mitigate the potential increases associated with the overall level of growth proposed through the Local Plan.

7.4 All of the sites that are allocated in the Local Plan, both residential and industrial, are considered to have negligible effects on this IIA objective as the effects of new development will depend largely on the detailed proposals for each site and its design, which would be influenced by policies in the Local Plan and detailed at the planning application stage, rather than by the location of sites.

7.5 However, the overall scale of residential and employment growth that is proposed to be delivered in Enfield will inevitably result in increased carbon emissions from buildings, commercial activities and road traffic, despite the strong mitigation that is built into the Plan. **Therefore, the overall cumulative effects of the Local Plan on IIA1 are considered to be mixed significant positive and minor negative (+ +/-).**

IIA objective 2: Ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought

7.6 Climate change adaptation is addressed directly through strategic objective 10 and various Local Plan policies, particularly those in the 'Sustainable Enfield' section of the plan. Policy DM SE7: Climate change adaptation and managing heat risk sets out measures to avoid exacerbating the urban heat island effect, which is known to be an issue in Enfield, requiring developments to incorporate mitigation measures to avoid overheating and to improve the micro-climate. A number of other Local Plan policies specifically address the increased risk of flooding resulting from climate change, including DM SE8: Managing flood risk and DM SE10: Sustainable drainage systems. The protection and enhancement of green infrastructure, for example through Policy SP BG1: Enfield's blue and green infrastructure network, will also help to manage flood risk by maintaining permeable surfaces to aid infiltration.

7.7 As with IIA1, all of the site allocations are considered to have negligible effects on this IIA objective as their effects will depend largely on the detailed proposals for each site and its design, which would be influenced by policies in the Local Plan and worked up in more detail at the planning application stage, rather than by the location of individual development sites.

7.8 Overall, the Local Plan is considered to have a cumulative minor positive (+) effect on IIA2.

IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people

7.9 The Local Plan will deliver a total of at least 24,920 new homes over the Plan period, equating to 1,246 per year, which meets the Borough's housing target as set out in the London Plan. Policy SP H1: Housing development sites allocates 45 sites for housing development, with a total capacity of 23,610 homes. Of these, 22 sites are allocated for housing alone while the other 23 are mixed-use sites which will incorporate housing development alongside other uses. All of the residential site allocations will have at least minor positive effects on IIA3 due to the nature of the development proposed, with 12 of the 22 residential allocations and 19 of the 23 mixed-use allocations having likely significant positive effects as they will each accommodate more than 100 homes.

7.10 Policies in the 'Homes for All' section of the Local Plan will combine to ensure that the housing provided on the allocated sites is of high quality and includes a range of types and tenures, including housing to meet the needs of specific groups such as the elderly and students. Policy DM H10: Gypsy and Traveller accommodation will ensure that provision is made for Enfield's Gypsy and Traveller population. Policy SP H2: Affordable Housing commits the Council to an aim of 50% of all new homes over

the Plan period being affordable. Other policies, particularly those in the 'Design and Character' section of the Local Plan, will ensure that housing is built to high standards of design and construction. In particular, Policy DM DE13: Housing standards and design sets out detailed criteria that new housing developments must adhere to, including preserving local amenity, being appropriately scaled and meeting accessible housing standards. Policy DM DE14: External amenity standards will ensure that appropriate outside amenity space is delivered within new housing developments, something that has been recognised as particularly important in the wake of the COVID-19 pandemic.

7.11 Overall, the Local Plan is expected to have a cumulative significant positive (++) effect on IIA3.

IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough

7.12 The Local Plan includes strategic objectives 2, 7, 11 and 12 and various policies that will combine to improve the health and wellbeing of local people, both directly and indirectly. In particular, strategic objective 2 and Policy SP SC1: Improving health and wellbeing of Enfield's diverse communities require development proposals to contribute to healthy and active lifestyles and to tackle health inequality, for example by providing access to sustainable transport links, green and blue infrastructure and open space and play facilities. The policy also requires certain development proposals to be subject to a Health Impact Assessment. Other Local Plan policies will address health and wellbeing indirectly, in particular those that seek to increase levels of walking and cycling – as well as increasing levels of physical activity, this will reduce car use and the associated pollutants which can be damaging to human health. As well as the cross-cutting policies which address active travel, in particular DM T2: Making active travel the natural choice, a number of the Place policies detail the ways in which development in certain parts of the Borough will seek to increase levels of walking and cycling, to the benefit of public health.

7.13 Policies in the Local Plan addressing the protection and enhancement of open spaces, including those policies in the Blue and Green Infrastructure and Rural Enfield sections of the Local Plan, will further benefit public health by ensuring access to high quality open spaces within the Borough which can be used for active outdoor recreation. The Plan also seeks to encourage healthy and affordable food production through Policy DM BG9: Allotments and community food production.

7.14 The site allocations containing residential development were assessed against this IIA objective on the basis of the access that they provide to existing GP surgeries, open space and walking and cycle paths. Twelve of the 22 housing site allocations and 12 of the 23 mixed-use site allocations will have significant positive effects alone on this objective, while a further nine housing sites and nine mixed-use sites will have significant positive effects as part of mixed effects overall. Seven of the housing site allocations and seven of the mixed-use allocations will have significant negative effects on IIA4, either alone or as part of a mixed effect overall as they may result in the loss of existing recreation assets. Therefore, a mixed significant positive and significant negative effect is likely to result from the overarching housing allocation policy, SP H1: Housing development sites. This mixed effect is uncertain as it is not yet known whether the existing recreation assets within allocated sites could in fact be retained within the new development. Another policy, DM BG10: Burial and crematorium spaces, has also been identified as having a potentially mixed significant negative and minor positive effect on this objective because although the policy will ensure that there are appropriate local places for dignified burial and cremation, three of the four burial/crematorium spaces allocated in the policy contain an area of open space and/or a cycle path that could be lost to development.

7.15 The overall scale of growth proposed through the Local Plan could put pressure on existing healthcare facilities such as GP surgeries; however the Local Plan makes provision for new infrastructure delivery, particularly through the Delivering and Monitoring policies.

7.16 Overall, the Local Plan is considered to have a cumulative mixed significant positive and uncertain minor negative (++) effect on IIA4.

IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time

7.17 The overall scale of growth proposed through the Local Plan could put increased pressure on local services, facilities and infrastructure, if appropriate provision is not made as part of new developments. While most of the increased pressure will come from residential development, the development of industrial sites will also increase pressure for transport infrastructure as well as some types of services and facilities. However, the Local Plan makes provision for the delivery of new services, facilities and infrastructure through a number of specific policies, namely those in the Delivering and Monitoring section of the Plan. These policies should combine to mitigate the increased pressure from new development. Policy SP D1: Securing contributions to

mitigate the impact of development addresses the funding of infrastructure such as parks and open space, schools and childcare places and public transport and highway improvements. Crucially, Policy DM D3: Infrastructure and Phasing requires planning applications to provide information about the phasing of new developments and associated infrastructure requirements – this will help to ensure appropriate phasing so that existing services, facilities and infrastructure are not overloaded by new residents before new provision is made.

7.18 Other policies in the Local Plan address the provision of specific types of infrastructure; for example, Policies SP SC1: Improving health and wellbeing of Enfield's diverse communities, SP SC2: Protecting and enhancing social and community infrastructure, DM CL5: Sport, open space and recreation and DM CL6: Protecting and attracting public houses.

7.19 The sites that are allocated for residential development, including mixed-use sites, were assessed against this objective on the basis of their proximity to existing schools. Almost all of the housing site allocations (21 out of 22) would have at least a minor positive effect, with eight having likely significant positive effects, while all of the mixed-use site allocations would have at least a minor positive effect, with half (12 out of 22) having a likely significant positive effect due to the access that they provide to existing schools.

7.20 Overall, the Local Plan is considered to have a cumulative significant positive (++) effect on IIA5.

IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity

7.21 The Local Plan includes several policies which directly seek to promote social inclusion, as well as strategic objective 18. Policy DM DE3: Inclusive design will apply to all development proposals and requires them to create more accessible, welcoming and inclusive spaces and places. Developments must provide an Inclusive Access Statement as part of the Design and Access Statement and proposals must reflect the diversity of the Borough's population, demonstrate responsive engagement with user groups with protected characteristics and provide flexible spaces which can be adapted to meet changing needs. Policy DM DE7: Creating liveable, inclusive and quality public realm requires developments to contribute to improving the permeability and accessibility of the public realm, while a number of the policies in the Homes for All section of the Local Plan address the particular housing needs of different groups, for example through Policy DM H5: Supported and specialist housing.

7.22 The sites that are allocated in the Local Plan were assessed against this IIA objective on the basis of whether they are located within the most deprived areas of Enfield, as new housing or industrial development in those areas can stimulate their regeneration. Only one site allocation is within one of the 10% most deprived areas of the Borough and so will have a significant positive effect, while 23 of the 62 allocations will have minor positive effects as they are within one of the 20% most deprived areas. The remaining 38 site allocations will have negligible effects as they are outside of the most deprived areas of Enfield. Therefore, the two overarching housing and employment site allocation policies (SP H1: Housing development sites and SP E1: Employment and growth) are both expected to have minor positive effects on this objective.

7.23 Overall, the Local Plan is considered to have a cumulative minor positive (+) effect on IIA6.

IIA objective 7: Reduce crime and increase community safety

7.24 Most of the Local Plan policies will have negligible effects on this IIA objective as most will not directly influence levels of crime and community safety (this is also not addressed by the vision and strategic objectives). However, some of the policies, particularly within the Design and Character section of the Local Plan, do directly address this issue. Policies DM DE6: Tall buildings and DM DE7: Creating liveable, inclusive and quality public realm include specific measures that will help to reduce crime and improve safety. DM DE6 seeks to protect residents and users from fire and other emergency situations and also makes reference to activating the street frontage, which can help reduce levels of crime through 'eyes on the street'. Policy DM DE7 promotes safety and counter-terrorism measures, whilst also seeking to increase activity and natural surveillance at ground floor level so as to increase safety. A number of other policies in the Local Plan make reference to the creation of safe and secure places, or active frontages, including SP DE1: Delivering a well-designed, high quality and resilient environment, DM DE9: Shopfronts and DM DE12: Civic and public developments. Several of the Place policies will also have minor positive effects on IIA7 as they make reference to the safety of new developments in specific parts of the Borough.

7.25 All of the site allocations made in the Local Plan will have negligible effects on IIA7 because the effects of new residential and industrial development on levels of crime and fear of crime will depend on factors other than the location of development, such as the design and layout of sites and the use of appropriate lighting.

7.26 Overall, the Local Plan is considered to have a cumulative minor positive (+) effect on IIA7.

IIA objective 8: Focus on delivering the ‘Vision Zero’ target for road safety

7.27 Most of the Local Plan policies will have negligible effects on IIA8 as not many will directly affect road safety (this is also not addressed by the vision and strategic objectives). However, a small number of policies including both of the policies in the Movement and Capacity section of the Local Plan set out measures that will protect road users and improve their safety. SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice both seek to ensure the safety of pedestrians and cyclists, while SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE7: Creating liveable, inclusive and quality public realm will both have significant positive effects on this objective because they require streets to be safe, uncluttered and suitable to their intended function and promote road safety and safer cycling and pedestrian movement around town centres and transport nodes. A number of other policies, including several of the Place policies, will have minor positive effects on IIA8 because of measures included within them to ensure that development does not adversely affect road safety.

7.28 All of the site allocations will have negligible effects on IIA8 because the effects of new residential and industrial development will depend largely on the detailed proposals for sites, rather than their locations.

7.29 Overall, the Local Plan is considered to have a cumulative minor positive (+) effect on IIA8.

IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all

7.30 The Local Plan provides for at least 251,500 sqm of net additional industrial and logistics floorspace and 37,000 sqm net additional office floorspace. Policy SP E1: Employment and growth allocates ten sites to deliver industrial development within the Borough. The policies in the Economy section of the Local Plan set out various ways in which the Council will seek to stimulate the Borough’s economy, creating high quality new workplaces in appropriate locations. The policies in the Town Centres and High Streets section of the Local Plan will also have broadly very positive effects on IIA9, as protecting and enhancing the vitality and vibrancy of town centres within Enfield will benefit the local economy.

7.31 There is some potential tension between the policies in the Local Plan that seek to protect and enhance the built and natural environment and the objective of supporting the local economy. For example, policies such as SP BG4: Green Belt and Metropolitan Open Land set out strict criteria that will apply to certain development proposals, and so could be seen as potentially restricting employment-related developments, to the detriment of the local economy. However, overall it is considered that such measures will serve to direct economic growth to the most appropriate locations within the Borough, rather than stifling growth, and it is also recognised that protecting and enhancing the local environment will have indirect positive effects for the economy, by making the Borough more attractive to visitors and investors.

7.32 All of the industrial site allocations are considered to have positive effects on this objective, due to the nature of the development proposed. Nine of the ten industrial site allocations will have minor positive effects on IIA9 as they are under 10ha in size, while one of the industrial site allocations is over 10ha and so will have a significant positive effect. The residential site allocations were assessed against this objective on the basis of their proximity to Strategic Industrial Locations and Locally Significant Industrial Sites as this will influence how easily new residents at those sites can access jobs. Three of the residential site allocations will have significant positive effects as they are adjacent to such employment locations, while the remaining 19 sites will have minor negative effects because they are located further from these key employment areas. However, it is recognised that these sites and areas are not the only sources of employment in the Borough.

7.33 Overall, the Local Plan is considered to have a cumulative significant positive (++) effect on IIA9.

IIA objective 10: Support the vitality of the Borough’s town and local centres

7.34 Policy SP SS1: Spatial strategy seeks directly to improve the Borough’s town and local centres because it supports the development of a mix of employment, retail, leisure, housing, community and cultural uses at Enfield Town, Meridian Water, Edmonton, Southbury, Southgate, New Southgate and Angel Edmonton, which will contribute significantly towards the local economy at the same time as enhancing the vitality of the centres. Policies within the Town Centres and High Streets section of the Local Plan directly address the vitality of the Borough’s town centres. In particular, Policy SP TC1: Promoting town centres seeks to secure the long-term vitality and viability of Enfield’s town centres by focussing growth and investment in those areas, ensuring an appropriate balance of uses and maintaining and enhancing local character and the quality of the built environment.

Policy SP TC2: Encouraging vibrant and resilient town centres also directly addresses this objective, seeking to ensure that town centres develop as vibrant and economically successful hubs which meet the needs of all users. In general, the Town Centres and High Streets policies will combine to ensure that Enfield's town centres (new and existing) are high quality environments which contain an appropriate range and mix of businesses, services and facilities, and that commercial operations are appropriately distributed within them.

7.35 Other policies in the Local Plan, particularly those relating to the quality of the built environment, will also positively affect the achievement of IIA10 as they will combine to ensure that town centres are attractive environments for people to spend time in, increasing footfall and spending.

7.36 The sites that are allocated for residential development were assessed against this objective on the basis of whether they are within or adjacent to a Major (i.e. Enfield Town), District (i.e. Palmers Green, Angel Edmonton, Southgate and Edmonton Green) or Local Centre (Arnos Grove, Bowes Road, Cockfosters, Green Lanes, Oakwood etc.) as new development located within one of these centres has the potential contribute to its vitality. Eighteen of the 22 residential site allocations and 15 of the 23 mixed-use site allocations are likely to have minor positive effects on this objective for that reason, while the remainder of the sites will have negligible effects as they are located away from Major, District and Local Centres.

7.37 Overall, the Local Plan is considered to have a cumulative significant positive (++) effect on IIA10.

IIA objective 11: Minimise air pollution and IIA objective 12: Minimise the need to travel and support a modal shift away from the private car

7.38 The likely cumulative effects of the Local Plan on IIA11 and 12 are summarised together, due to the close linkages between air pollution and levels of car use – for many of the policies, the likely effects on these two objectives are the same.

7.39 The Local Plan includes numerous policies (and strategic objectives) seeking to encourage modal shift and increase levels of sustainable transport use, which will have the associated benefits of reducing air pollution from car use. These policies will help to mitigate the potential negative effects of the overall scale of growth proposed in the Local Plan, which could lead to increased traffic in the area. In particular, the policies in the Movement and Capacity section of the Local Plan directly address this issue. Policies SP T1: Promoting sustainable transport and DM T2: Making active travel the natural choice specifically aim to reduce car use and to encourage Enfield's residents to walk and cycle day to day. The Place policies also set out locally specific ways in which development will be required to facilitate and encourage modal shift, which will reduce transport-related air pollution and mitigate the potential increases associated with the overall level of growth proposed through the Local Plan. However, the residential-led mixed-use development schemes provided for within almost all of the Place policies may attract more people to each area, which could increase the number of cars on the road with adverse effects on air quality and many of the site allocations at each placemaking area scored 2 (i.e. significant negative) in the air quality appraisal as discussed below.

7.40 While there are policies in the Local Plan which could result in enhancements to the highways network, such as Policy SP D1: Securing contributions to mitigate the impact of development, which could be seen as potentially discouraging modal shift, it is also noted that reducing congestion could help to reduce concentrations of pollutants in those congestion hotspots.

7.41 The site allocations were assessed against IIA11 on the basis of an independent high-level qualitative air quality appraisal, which has been carried out by WSP on behalf of the Council. This involved considering the estimated size/capacity of each site as well as whether the site is within 1km of an existing Air Quality Focus Area (AQFA)⁴⁷. The findings were presented using a simple scoring system between 0-2, with 2 representing sites that would perform most poorly in relation to air quality⁴⁸. Thirty eight of the 62 allocated sites were found to have potential significant negative effects on this objective, while 22 could have minor negative effects and two are expected to have negligible effects.

7.42 Site allocations were assessed against IIA12 on the basis of their proximity to sustainable transport links as well as their proximity to a Major, District or Local Centre, as this will reduce the need for residents to travel long distances on a regular basis to access services and facilities. Of the 62 site allocations, 55 were found to have significant positive effects on sustainable

⁴⁷ AQFAs not only exceed the EU annual limit for nitrogen dioxide but are also locations with high human exposure. AQFAs identify areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues.

⁴⁸ It should be noted that there is some uncertainty associated with these findings at this stage, as the WSP assessment has not taken into account measures that will improve future air quality (such as the expansion of the Ultra-low Emissions Zone to the North Circular Road in 2021 or petrol and diesel car ban in 2030), or site specific mitigation. Detailed quantitative assessment of air quality impacts will be undertaken at the Regulation 19 stage.

transport (for 11 sites this is mixed with a potential minor negative effect and for five sites this is mixed with a potential significant negative effect), while six sites are likely to have a minor positive effect (for one site this is mixed with a minor negative effect and for one site it is mixed with a significant negative effect) and the final site is expected to have a negligible effect on sustainable transport.

7.43 Overall, the Local Plan is considered to have cumulative mixed significant positive and minor negative (+/-) effects on IIA11 and IIA12.

IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks

7.44 The large-scale housing and employment growth proposed through the Local Plan could have negative effects on biodiversity, particularly where development is proposed on greenfield land (although it is recognised that brownfield land can still harbour valuable biodiversity). The individual development sites that are allocated in the Local Plan have been assessed against this objective on the basis of their proximity to national or local designated conservation sites as development in these locations has the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application. Forty-two of the 62 site allocations have been found to have potential but uncertain significant negative effects on biodiversity, while 12 could have minor negative effects and seven are most likely to have negligible effects. One site is likely to have a significant positive effect because it is allocated as a nature recovery site and will therefore contribute significantly to the ecological potential of the area. Likely effects on internationally designated sites have been assessed through the separate Habitats Regulations Assessment which has concluded that there are uncertain but likely significant negative effects for any of the development sites within the Borough, in relation to impacts of air pollution on the Epping Forest SAC. This will be explored in more detail through at the Regulation 19 stage of the Local Plan preparation.

7.45 The Local Plan includes various policies which specifically aim to conserve and enhance biodiversity, and so may serve to mitigate the potential adverse impacts of the new development proposed, particularly the policies in the Blue and Green Enfield section of the Local Plan. Policies SP BG2: Protecting nature conservation sites and SP BG3: Biodiversity net gain, rewilding and offsetting will provide particularly strong mitigation, while policies relating to green infrastructure provision, urban greening and watercourses will also help to avoid the potential adverse effects of development and may even deliver improvements.

7.46 Overall, due to the scale of the development proposed through the Local Plan and the proximity of allocated sites to biodiversity designations, a potential but uncertain cumulative significant negative effect (--?) is identified for IIA13.

IIA objective 14: Sustain and enhance the significance of heritage assets

7.47 The large-scale housing and employment development that is proposed through the Local Plan could have negative effects on the cultural heritage of Enfield, for example by impacting upon the setting of heritage assets such as almost 500 listed buildings and 22 Conservation Areas. The initial assessment of site options against this objective was based on the proximity of sites to designated heritage features and, where a site is within 500m of such features, professional judgement and evidence has been used to inform judgements. Following this, the effects were adjusted to reflect the Council's assessment of heritage considerations and impacts on Archaeological Priority Areas, and any mitigation proposed. The IIA has concluded that 33 of the 62 site allocations could have minor negative effects on cultural heritage. The remaining 29 sites are most likely to have negligible effects. In all cases the potential negative effects are uncertain as they will be determined by the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).

7.48 A number of Local Plan policies address the protection and enhancement of the historic environment and so should help to mitigate the potential negative effects of new development on cultural heritage. In particular, Policy SP DE4: Putting heritage at the centre of placemaking, which requires new development to respond to the cultural, built and landscape heritage of existing communities and take opportunities to integrate it into the sustainable growth agenda; as well as better revealing heritage which

is not formally recognised, valued or understood and preparing a heritage statement. In addition, Policy DM DE10: Conserving and enhancing heritage assets sets out detailed criteria that will apply to new developments, with proposals being required to conserve and enhance the significance of heritage assets and to put them to viable uses consistent with their conservation; to utilise the Borough's heritage resource to realise wider social, cultural, economic and environmental benefits for affected communities; to make a positive contribution to local character and distinctiveness and to draw on the contribution made by the historic environment to the character and identity of a place. Other policies which address high quality design more generally should also provide mitigation for the potential impacts of new development on cultural heritage features in and around the Borough.

7.49 Overall, due to the scale of the development proposed through the Local Plan and the proximity of allocated sites to sensitive heritage features, a potential but uncertain cumulative minor negative effect (-?) is identified for IIA14.

IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes

7.50 Enfield sits within the Northern Thames National Character Area, which is characterised by "*a diverse landscape ranging from the wooded Hertfordshire plateaux and river valleys, to the open landscape and predominantly arable area of the Essex heathlands, with areas of urbanisation mixed in throughout*". Enfield's landscape character is partly defined by its topography with higher ground in the north west of the Borough (mostly rural designated as green belt), gradually descending through the urban areas into the Lee Valley in the east of the Borough. The large-scale new development to be delivered through the Local Plan could have adverse effects on the character and quality of the Borough's landscapes and townscapes; however it also offers opportunities to achieve enhancements through high quality and appropriately located new development which may benefit the townscape. The development site allocations have been assessed against this objective on the basis of whether they are located within a settlement and/or contain built development, as well as the scale of the sites. This is because development sites that are adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites, particularly towards the northwest of the Borough. Larger scale sites may also have more of an impact. However, the actual effect on landscape/townscape will also depend on the design, scale and layout of development within the site, which may help mitigate any adverse effects on landscape and/or enhance effects on the existing townscape. Therefore, all effects are currently recorded as uncertain. Forty-one of the 62 site allocations are located within a settlement and contain existing built development and so could have a minor positive effect on the townscape, while eleven sites could have significant negative effects and seven could have minor negative effects. Those sites are outside of existing settlements and some are large in scale.

7.51 The Local Plan includes a number of policies which specifically aim to conserve and enhance the quality and character of the area, including policies relating to the Green Belt (SP BG4: Green Belt and Metropolitan Open Land and SP BG5: Green Belt and edges of the countryside/urban areas). Policies relating to the provision of green infrastructure will benefit the overall character and appearance of Enfield and the setting of built development, while policies requiring high quality design will also provide mitigation. Given the urban nature of much of the Borough, the policies in the Local Plan relating to the protection and enhancement of the townscape and built environment will be particularly important in mitigating the potential negative effects of new development on this objective. This includes policies such as SP DE1: Delivering a well-designed, high quality and resilient environment and DM DE5: Strategic and local views.

7.52 Overall, the Local Plan has a potential but uncertain cumulative mixed significant positive and minor negative (+ +/- ?) effects on IIA15.

IIA objective 16: To achieve efficient use of land and materials

7.53 A number of the policies in the Town Centres and High Streets section of the Local Plan will have positive effects on IIA16 as they seek to direct development to town centre locations where brownfield land is more likely to be available and promote the efficient use of land in those areas. Policy DM H4: Small sites and small housing development promotes efficient land use in relation to small housing developments and policy DM SE3: Whole-life carbon and circular economy requires that development proposals prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings. However, some negative effects have been identified against this IIA objective, including from Policy DM BG10: Burial and crematorium spaces which allocates sites on greenfield land. The overarching housing and employment policies are both expected to have mixed effects on this objective, as is strategic policy SP SS1. The sites allocated within those policies have been assessed against IIA16 on the basis of whether they are on greenfield or brownfield land, their size and, if greenfield, the agricultural quality of the land. Only 11 of the 62 allocations could have significant negative effects, while 14 could have

significant positive effects and 35 are expected to have minor positive effects. This reflects the fact that many of the site allocations are on brownfield land.

7.54 Overall, the Local Plan will have a cumulative mixed minor positive and minor negative (+/-) effect on IIA16.

IIA objective 17: To manage and reduce the risk of flooding

7.55 The River Lee is the Borough's primary watercourse, which runs north to south along the eastern boundary of the Borough through a highly urbanised catchment. The main tributaries to the River Lee that flow through the Borough are: Pymmes Brook, Salmons Brooks and Turkey Brook. They generally flow eastwards through Enfield towards the River Lee. The topography of Enfield follows that of these tributaries, with the Borough generally sloping in an easterly direction towards the River Lea. Land adjacent to the three main River Lea tributaries is categorised as fluvial flood zones 2 and 3. The area most at risk is the eastern length of the Borough which follows the Lee Valley.

7.56 The overall scale of development proposed through the Local Plan could result in an increased risk of flooding, particularly if development is on greenfield land or in areas of high flood risk. The site allocations were assessed against IIA17 on the basis of an independent high-level flood risk appraisal, carried out by BMT on behalf of the Council. This involved identifying sites that fall within Flood Zones 2 and 3 and whether they are at risk of surface water flooding using their predicted peak flood depth. 44 of the site allocations were identified as having a significant negative effect, whilst 13 were identified as having a minor negative effect. Five are expected to have negligible effects.

7.57 The Local Plan includes numerous policies seeking to ensure that new development does not increase the risk of flooding, including DM SE8: Managing flood risk and DM SE10: Sustainable drainage systems in particular. A number of other policies in the Plan make reference to the management of flood risk including some of the Place policies. These policies will provide mitigation and overall, **the Local Plan is considered to have an uncertain cumulative minor negative (-?) effect on IIA17.**

IIA objective 18: Minimise water use and protect water quality

7.58 The overall scale of development proposed through the Local Plan will result in increased demand for water abstraction and treatment. Enfield is supplied by Thames Water for both potable and wastewater services and sits within the London Water Resource Zone and an area of water stress where demand is high and supply subject to constraints. In addition, the Borough is served by the Deephams Sewage Treatment Works, which the Environment Agency has highlighted the need for a significant upgrade to service the growing population. There are also a number of water quality issues that impact the Borough, with none of the main watercourses currently meeting the Water Framework Directive required ecological status of 'Good'.

7.59 Site allocations were assessed against this objective on the basis of whether they contain a watercourse or water body or lie within a Source Protection Zone. Thirty-nine of the 62 allocated sites could have significant negative effects for that reason, while the remaining 23 sites will have negligible effects.

7.60 Most of the policies in the Local Plan will have negligible effects on this objective, although a small number directly seek to address water quality in the Borough and so will have significant positive effects and should help to mitigate the potential adverse effects of new development. In particular, Policy DM SE9: Protection and improvement of watercourses sets out detailed requirements for development proposals close to watercourses, including requiring them to enhance the ecological, flood risk, water quality aesthetic and amenity quality of the watercourse and to apply the objectives of the Thames River Basin Management Plan. Policy SE10: Sustainable drainage systems requires developments to use sustainable drainage systems (SuDS) to reduce pollution, where relevant. Policy SP BG1: Enfield's blue and green infrastructure network requires development proposals to protect, improve and enhance access to blue spaces and the wider water environment and to improve the relationship with the river and naturalise the riverbank through the removal of hard engineered walls and culverts and introducing new habitats to the river corridor. Policies such as these will provide mitigation for the potential negative effects of the overall scale of new development on the water environment.

7.61 Overall, the Local Plan is therefore expected to have a potential but uncertain cumulative minor negative effect (-?) in relation to IIA18.

Summary of IIA cumulative effects of the Enfield Local Plan

7.62 Table 7.5 summarises the single overall cumulative effect of the Enfield Local Plan: Main Issues and Preferred Approaches document on each of the IIA objectives, that have been described above.

Table 7.5: Summary of IIA cumulative effects for the whole Enfield Local Plan: Main Issues and Preferred Approaches document

IIA objective	Enfield Local Plan: Main Issues and Preferred Approaches document
IIA1: Climate change mitigation	++/-
IIA2: Climate change adaptation	+
IIA3: Housing	++
IIA4: Health and wellbeing	++/-?
IIA5: Services and facilities	++
IIA6: Social inclusion	+
IIA7: Crime and community safety	+
IIA8: Road safety	+
IIA9: Economy	++
IIA10: Town and local centres	++
IIA11: Air pollution	++/-
IIA12: Sustainable transport	++/-
IIA13: Biodiversity	--?
IIA14: Historic environment	-?
IIA15: Landscape and townscape	++/-?
IIA16: Efficient use of land and materials	+/-
IIA17: Flooding	-?
IIA18: Water	-?

7.63 It can be seen from **Table 7.5** and the discussion above, that the preferred approach set out in the 2021 Enfield Local Plan Regulation 18 consultation document is likely to have an overall positive cumulative effect on the majority of the IIA objectives, covering social, economic and environmental issues, health and equalities and community safety. Where there are potential negative effects identified (e.g. on biodiversity, historic environment, landscape/townscape, water quality), these are uncertain because they will depend on the detailed design and layout of new developments proposed on allocated sites, which are unknown at this stage. Masterplanning requirements and development briefs for the larger site allocations may be firmed up in the Regulation 19 plan and could influence the cumulative effects identified at that stage, although there are already a number of positive and strong development management policies in the plan that will help to mitigate the potential effects identified. The remaining minor negative effects identified in Table 7.5 (on health, climate change mitigation/air pollution/sustainable transport and efficient use of land) reflect the overall scale of residential and employment growth that is proposed to be delivered in Enfield, which will inevitably result in pressure on existing health care facilities, increased carbon emissions from buildings, commercial activities and road traffic, and a loss of some greenfield land despite the strong mitigation that is built into the Plan. Health infrastructure and other community facilities and services should be planned in and delivered in advance or alongside new residential development and this is being addressed through the Infrastructure Delivery Plan. There are also good intentions in the Local Plan to encourage a switch to public transport and active travel, and wider Government initiatives and policy should help to reduce road travel, car emissions and therefore air pollution and climate change. Most of the new growth

required is focused in the urban areas, with only some greenfield land development proposed because it will not be possible to achieve the required growth through intensification of the urban areas alone, without significantly altering the character, density and height of Enfield's urban areas.

Chapter 8 Monitoring

8.1 The SEA Regulations require that "*the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*" and that the environmental report should provide information on "*a description of the measures envisaged concerning monitoring*". Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

8.2 Although national Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Local Plan, the reason for this is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the IIA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this IIA Report in relation to all of the IIA objectives in the IIA Framework. As the Local Plan is implemented and the likely significant effects become more certain, the Council may wish to narrow down the monitoring framework to focus on those effects of the Local Plan likely to be significantly adverse.

8.3 Table 8.1 sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the Local Plan. The data used for monitoring in many cases will be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the Council remains in dialogue with statutory environmental consultees and other stakeholders and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable. This table will be updated at subsequent stages of the Local Plan preparation to reflect any revisions made to the proposed monitoring indicators for the Local Plan itself.

Table 8.1: Proposed monitoring indicators

IIA objective	Proposed monitoring indicators
IIA objective 1: Ensure the Local Plan serves to minimise LBE's per capita CO ₂ emissions such that the Borough is on track to achieve carbon neutrality by 2030.	<ul style="list-style-type: none"> ■ Per capita reduction in CO₂ emissions in the Borough ■ Carbon emissions from transport
IIA objective 2: Ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought.	<ul style="list-style-type: none"> ■ Renewable energy generation: installation of new capacity for energy generation from renewable resources ■ Number of new residential developments where the energy/emissions standards in the Building Regulations Part L have been exceeded
IIA objective 3: Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people.	<ul style="list-style-type: none"> ■ Percentage of total housing units completed that are affordable ■ Quantum and proportion of Part M4(3) compliant homes delivered ■ Completion of the Council's Vulnerable Adults Accommodation Strategy ■ Net additional dwellings in previous year ■ Gross affordable housing completions

IIA objective	Proposed monitoring indicators
	<ul style="list-style-type: none"> ■ Percentage of total housing units that are intermediate/social rented ■ Net additional pitches for gypsies and travellers ■ Housing size (no. of beds) for market/social rented housing
<p>IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough.</p>	<ul style="list-style-type: none"> ■ S.106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services ■ Access to a GP ■ Quantity of open space (by type) ■ Children and young people's satisfaction with parks and play areas (Enfield's Tell Us Survey) ■ Satisfaction with parks and play areas ■ Obesity rates in adults and children ■ Life expectancy
<p>IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.</p>	<ul style="list-style-type: none"> ■ Number of primary and secondary school places ■ % of population within 30 minute public transport time of educational, healthcare and community facilities ■ S.106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services ■ GCSE passes ■ Review and publication of relevant Council Strategies, which influence the provision of recreation, leisure, culture and arts facilities ■ Qualifications
<p>IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity.</p>	<ul style="list-style-type: none"> ■ Employment / unemployment rate in the Borough ■ Index of Multiple Deprivation
<p>IIA objective 7: Reduce crime and increase community safety.</p>	<ul style="list-style-type: none"> ■ Crime rates – total offences per population ■ Serious acquisitive crime rates
<p>IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety.</p>	<ul style="list-style-type: none"> ■ Killed or Seriously Injured (KSI) casualty figures for adults and children
<p>IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all.</p>	<ul style="list-style-type: none"> ■ Total amount of additional employment floorspace ■ New jobs ■ Employment floorspace designated as Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites ■ Economic activity: % population in employment

IIA objective	Proposed monitoring indicators
	<ul style="list-style-type: none"> ■ Total amount of office floorspace (Class E) in (i) town centres (ii) local authority area
<p>IIA objective 10: Support the vitality of the Borough's town and local centres.</p>	<ul style="list-style-type: none"> ■ Total amount of additional floorspace for 'town centre' uses in town centres ■ New recreation, leisure, culture and arts facilities delivered ■ The delivery of the ten Place policies ■ Pedestrian footfall count
<p>IIA objective 11: Minimise air pollution.</p>	<ul style="list-style-type: none"> ■ % of journeys to work by public transport or active transports ■ Air quality – average NO₂ and PM₁₀ levels (mg/m³)
<p>IIA objective 12: Minimise the need to travel and support a modal shift away from the private car.</p>	<ul style="list-style-type: none"> ■ Delivery and implementation of travel plans and transport assessments ■ Delivery of the Upper Lee Valley Transport Study ■ Travel to work ■ Implementation of Travel Plan with Transport for London's iTrace system ■ Completed sections of Enfield walk and cycle networks ■ Rail service frequency
<p>IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks.</p>	<ul style="list-style-type: none"> ■ Change in areas of biodiversity importance ■ Natural England's SSSI condition assessments for SSSIs within the Borough ■ Achievement of Biodiversity Action Plan targets
<p>IIA objective 14: Sustain and enhance the significance of heritage assets.</p>	<ul style="list-style-type: none"> ■ Number of buildings on Historic England's Buildings at Risk Register ■ Review of Conservation Area Appraisals and Management Proposals (every 5 years) ■ Number and % of Listed Buildings (all grades), Scheduled Monuments, Registered Parks and Gardens and Conservation Areas
<p>IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes.</p>	<ul style="list-style-type: none"> ■ Landscape character appraisals and impacts ■ % of development built on brownfields sites/previously developed land ■ Number and extent of field boundaries affected
<p>IIA objective 16: To achieve efficient use of land and materials.</p>	<ul style="list-style-type: none"> ■ Previously developed land that has been vacant or derelict for more than 5 years ■ Capacity of new waste management facilities (North London Waste Plan)

IIA objective	Proposed monitoring indicators
	<ul style="list-style-type: none"> ■ Amount of municipal waste arising and managed (by management type, by waste planning authority) ■ Best and most versatile agricultural land in the Borough
<p>IIA objective 17: To manage and reduce the risk of flooding</p>	<ul style="list-style-type: none"> ■ Number of planning permissions granted contrary to the advice of the Environment Agency on flood and water quality grounds ■ Properties at risk from flooding ■ The progress of flood alleviation schemes and river restoration works ■ Number of & of permitted developments incorporating SuDS
<p>IIA objective 18: Minimise water use and protect water quality.</p>	<ul style="list-style-type: none"> ■ Water conservation and efficiency and sustainable drainage measures incorporated into new developments ■ River quality chemical and biological ■ Water use per household

Chapter 9

Conclusions and next steps

Conclusions

9.1 This IIA report has been prepared to accompany the Regulation 18 consultation for the Enfield Local Plan: Main Issues and Preferred Approaches. The IIA has sought to identify significant sustainability effects, including health, equalities and community safety emerging from the Enfield Local Plan, through an integrated impact assessment process that seeks to meet requirements in the SEA Regulations and NPPF and good practice set out in the PPG.

9.2 The Enfield Local Plan: Main Issues and Preferred Approaches consultation document draws on the consultation feedback from the early Issues and Options consultation stages but takes account of the current policy context set by the NPPF and requirements in the recently adopted London Plan in setting out a preferred spatial strategy for meeting a medium level of growth (24,920 homes). The Enfield Local Plan's preferred approach is set out in Policy SS1: Spatial Strategy and directs the new growth required to sites in existing settlements, strategic areas within the Green Belt, and a limited number of sites which will be released from the Green Belt due to the exceptional circumstances identified in the Local Plan. The spatial strategy pursues the more intensive use of urban land, particularly in a number of the place-making areas identified in policies PL1 to 10 in Chapter 3 of the Local Plan. It also allows for employment needs to be met through intensification of existing industrial areas (SILs and LSIS), a small extension of strategic industrial land, and new sites in urban and rural locations. A new logistics hub close to Junction 24 of the M25 will provide for a significant amount of the Borough's employment needs in the plan period.

9.3 In addition to the preferred spatial strategy for new development needs, the Enfield Local Plan: Main Issues and Preferred Approaches provide strong policy direction on the full range of local planning issues across the Borough, i.e. addressing the Borough's response to climate change, improving the environmental quality and social inclusivity of the Borough, creating healthier communities, planning for sustainable travel and connectivity, and seeking to reduce disparities between the east and west of the Borough. The proposed policies in the Main Issues and Preferred Approaches document have the potential to generate new significant positive changes for the county across the range of sustainability issues tested in this IIA process, as shown in the number of positive cumulative effects identified in Chapter 7 of this IIA Report.

9.4 Nevertheless, the large-scale development proposed through the Enfield Local Plan, some of which will be on greenfield land does have the potential to generate new adverse effects during construction but also occupancy by new residents (and their associated travel movements) on the Borough's sensitive biodiversity and heritage assets, landscape and townscape, water and air quality and agricultural land. It is clear that every effort is being made in the Enfield Local Plan to avoid and minimise such adverse effects through the definition of a robust and diverse range of place-making and development management policy approaches.

9.5 The London Borough of Enfield does not exist in isolation. Neighbouring boroughs and districts are also planning to deliver considerable amounts of development. This will result in in-combination effects, in particular increased urbanisation including the generation of additional traffic, and put pressure on resources, such as water, air quality, heritage and on ecological networks. It is therefore important that Enfield Council continues to work closely with its neighbours and the Greater London Authority to make sure that their plans are co-ordinated to provide an integrated approach to maintaining and enhancing quality of life for all their residents, workers and visitors, and to ensure that a rich, high quality and resilient environment is created.

Next Steps

9.6 This IIA Report will be available for consultation alongside the Regulation 18 Enfield Local Plan: Main Issues and Preferred Approaches from 21 June to 13 September 2021.

9.7 Following this consultation, the Council will consider the representations received from stakeholders and additional, emerging evidence in order to prepare a revised version of the Local Plan for Regulation 19 consultation. That consultation will be on the version of the Local Plan that the Council proposes to submit to the Secretary of State for examination and will be

accompanied by an updated and amended IIA Report. Consultation at that stage will be limited to issues of soundness or legal failings, as set out in national policy, guidance and legislation.

9.8 Following the above periods of public consultation, the Local Plan will be independently examined by a Government-appointed Planning Inspector appointed by the Secretary of State, who will consider and challenge its content and any objections to it and reach a decision on its overall 'soundness' before it can proceed to be adopted.

LUC

June 2021