London Plan LBE officer responses – in full – for submission.

Chapter 2: Making best use of land and achieving good growth

Policy MBUL: Spatial Strategy

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response:

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response:

Enfield Council supports the objective of planning positively for London's growth and recognises the role of the London Plan as a strategic spatial development strategy. The Council supports infrastructure-led growth, regeneration and sustainable development.

However, the Council considers that Policy MBUL1 is not fully Justified and is not currently demonstrated to be Effective, having regard to the August 2026 NPPF.

The Council supports the objective of meeting London's development needs and does not object to the policy's positive preparation in principle. Its concerns relate principally to whether the chosen spatial strategy is the most appropriate strategy for Enfield when considered against reasonable alternatives, and whether there is a reasonable prospect of its delivery.

Justified
The evidence base does not provide sufficient borough-specific explanation of the assumptions underpinning Enfield's housing and employment growth contribution.

Policy MBUL1 identifies significant growth expectations for Enfield, including Broad Locations for Growth, future candidate Broad Locations for Growth and strategic Green Belt growth assumptions. However, the evidence does not clearly explain the relative contribution expected from:

- existing commitments and allocations;
- Meridian Water;
- Crews Hill and Chase Park;
- small sites and intensification;

- industrial capacity assumptions; and
- future Green Belt growth assumptions.

The Council therefore considers that the evidence does not yet demonstrate that the proposed approach is the most appropriate strategy for Enfield when considered against reasonable alternatives.

The evidence reviewed does not demonstrate clearly how alternative approaches were assessed, particularly in relation to:

- the scale and distribution of growth;
- reliance on Green Belt Broad Locations for Growth;
- future candidate Broad Locations for Growth;
- alternative assumptions regarding intensification; and
- alternative infrastructure-led growth scenarios.

The strategy also relies substantially on London-wide methodologies, including the Sustainable Access Measure, London Context Map and Optimisation Framework. These provide useful strategic tools, but the evidence does not adequately demonstrate how they reflect outer London circumstances, including:

- family housing requirements;
- suburban character and townscape;
- orbital travel patterns;
- strategic industrial and logistics functions;
- local viability considerations;
- infrastructure constraints; and
- borough-specific growth and placemaking objectives.

The status and effect of Broad Locations for Growth and future candidate Broad Locations for Growth also require clarification. The London Plan should distinguish clearly between:

- identifying broad strategic opportunities;
- establishing indicative strategic capacity;
- allocating specific sites;
- changing Green Belt boundaries; and
- determining detailed infrastructure and delivery requirements.

The Plan should confirm that identification or safeguarding of a future candidate location does not amount to site allocation, predetermine Green Belt release or remove the need for borough-level evidence, consultation, Green Belt assessment and independent examination through the Local Plan process.

The London Plan Viability Study is a high-level, pan-London, typology-based assessment. It does not provide sufficient location-specific evidence to demonstrate that the capacity attributed to Enfield's Broad Locations for Growth is economically viable and deliverable.

Further Enfield-specific testing is required for Crews Hill and Chase Park, covering:

- land ownership and assembly;
- existing land interests and rights;
- development form and density;
- market absorption and phasing;
- transport and infrastructure costs;
- abnormal costs;
- affordable housing and grant assumptions;
- cumulative policy costs; and
- long-term stewardship and delivery arrangements.

The Council does not consider the use of Existing Use Value plus a premium to be inherently inappropriate. However, borough-level testing is required to understand how strategic benchmark assumptions interact with actual ownership patterns, land assembly costs and realistic land-release expectations.

Effective

The Council considers that Policy MBUL1 is not currently demonstrated to be Effective because the infrastructure, viability, funding and implementation pathways necessary to support the proposed spatial strategy are not established with sufficient clarity.

The evidence identifies strategic transport, utility and social-infrastructure pressures arising from growth. However, it does not provide a sufficiently clear delivery pathway for the strategic growth locations identified within Enfield.

In particular, further clarity is required concerning:

- transport and public transport interventions;
- freight and logistics mitigation;
- utilities and network reinforcement;
- social infrastructure;
- delivery responsibilities;
- funding and finance assumptions;
- land assembly;
- phasing and implementation timescales; and
- the relationship between infrastructure delivery and housing delivery.

The strategic transport evidence identifies pressures arising from growth but does not demonstrate the location-specific interventions required to support Crews Hill, Chase Park or the M25/A10 Northern Lea Valley. The utilities evidence does not clearly demonstrate that the cumulative effects of housing, industry, logistics and high-energy-demand uses have been assessed together.

The viability evidence also indicates that strategic Green Belt growth depends on significant interventions, including:

- affordable housing grant;

- low-cost finance;
- public-sector or Registered Provider-led delivery;
- land assembly;
- upfront enabling infrastructure;
- masterplan consent mechanisms; and
- long-term stewardship.

These are material delivery assumptions rather than marginal mitigations. The Plan should identify the organisations expected to lead delivery, the funding and finance routes relied upon, how land will be assembled, how infrastructure will be phased and which body will carry the principal delivery and financial risks.

Without this framework, the evidence demonstrates potential viability under an intervention scenario rather than a reasonable prospect that the attributed capacity can be delivered.

Modifications sought

To make Policy MBUL1 sound, Enfield Council requests that the policy and supporting text be modified to:

- clarify the borough-specific assumptions underpinning Enfield's housing and employment growth contribution;
- explain how reasonable alternative growth, distribution and infrastructure scenarios were assessed;
- clarify the status and effect of Broad Locations for Growth and future candidate Broad Locations for Growth;
- confirm that safeguarding does not amount to site allocation or predetermine Green Belt release;
- clarify the relationship between the London Plan and borough Local Plan processes;
- identify the infrastructure dependencies, funding assumptions, phasing and delivery mechanisms associated with strategic growth locations;
- clarify the geography and delivery assumptions associated with the M25/A10 Northern Lea Valley Green Belt Industrial Broad Location for Growth;
- demonstrate that London-wide methodologies have been tested against outer London conditions and Enfield-specific circumstances;
- require Enfield-specific viability and delivery assessment for Crews Hill and Chase Park;
- identify the organisations, funding, finance, land-assembly and stewardship arrangements relied upon; and
- include monitoring and review arrangements where assumed infrastructure, funding or public-sector interventions do not materialise.

Conclusion

Enfield Council supports strategic and infrastructure-led growth in principle. However, Policy MBUL1 is not fully Justified because the borough and location-

specific assumptions underpinning Enfield's growth contribution, viability and assessment of alternatives have not been demonstrated with sufficient clarity.
The policy is also not currently demonstrated to be Effective. Delivery depends on substantial transport and utility investment, public funding, low-cost finance, land assembly, public-sector leadership and long-term stewardship, but the responsible bodies, funding routes, phasing and implementation mechanisms are not established.

The Council therefore seeks the modifications above while retaining the policy's strategic objective.

MBUL2: Optimising the use of land and site capacity

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response:

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response:

The London Borough of Enfield supports the objective of making effective use of land and increasing housing delivery in sustainable locations. However, the Council considers that Policy MBUL2 is not fully justified and is only partly effective because it does not provide sufficient flexibility for boroughs to determine what optimisation means in different local contexts.

The policy identifies the important strategic need to increase housing delivery and optimise land use. However, it places significant reliance on the Optimisation Framework, SAM and London Context Map to establish density and height expectations across London. While these tools may provide a strategic baseline, the Council does not consider that they remove the need for place-specific assessment, masterplanning, infrastructure planning and design testing.

Justified
The supporting evidence recognises that London contains materially different character settings, accessibility levels, development typologies, parking assumptions and viability conditions. However, the policy does not sufficiently explain why optimisation assumptions should be applied so uniformly across these different contexts, nor why boroughs should have only a limited role in refining them through local evidence.

The Council is also unclear whether reasonable alternatives were fully considered. In particular, it is not evident that the evidence tested an approach whereby the Optimisation Framework provides a strategic baseline whilst allowing boroughs to refine density and height expectations through local plans, character studies, design codes and masterplans. Such an approach would better reflect differing local circumstances while retaining a strategic London-wide framework.

Effective
The Council is concerned that the policy may create an impression of certainty which, in practice, will still require extensive local interpretation.

Successful implementation of the policy will depend on:
- place-specific masterplanning;
- infrastructure capacity and delivery;
- viability;
- local character and townscape considerations; and
- coordination across multiple sites and landowners.

The evidence itself recognises that more detailed approaches may be required through masterplans and design codes, and that site-specific design responses remain necessary.

The Council also notes that the London Plan Viability Study Phase 1 Report July 2026 identifies a viability tipping point in many Outer London locations, with viability becoming more challenging when development exceeds six storeys. This raises legitimate questions about whether some optimisation assumptions are deliverable in practice without further local testing and refinement.

The policy would therefore be more effective if it placed greater emphasis on borough-led masterplanning, design coding and local evidence to determine how optimisation should be applied in different locations.

Additional concern
The Council also seeks clarification regarding the use of different density metrics across the Plan. Policy MBUL2 relies primarily on habitable room density measures, whereas other parts of the Plan, including Green Belt growth scenarios, use dwellings per hectare. The rationale for this distinction, and its implications for housing mix and family housing provision, are not clearly explained.

Consistency with National Policy
The August 2026 NPPF supports the efficient use of land, optimisation and minimum densities, but also places considerable emphasis on local evidence, local circumstances, masterplanning and design coding. Policies PM13, L1 and DP1 support the use of locally justified standards and place-based approaches to intensification.

The Council considers that Policy MBUL2 would be more consistent with national policy if it provided a clearer role for boroughs to refine optimisation assumptions through local plans, character studies, design codes and masterplans.

Suggested Modification
The Council supports retention of the Optimisation Framework as a strategic tool but recommends that Policy MBUL2 be amended to:

- confirm that optimisation ranges are strategic assumptions rather than fixed expectations;
- explicitly recognise the role of local plans, character studies, design codes and masterplans in refining optimisation assumptions;
- require place-specific assessment in locations identified for significant growth or intensification; and
- clarify the relationship between differing density metrics used across the Plan.

These amendments would improve the policy's effectiveness and provide greater confidence that optimisation will be delivered in a manner that reflects local character, infrastructure capacity and deliverability.

MBUL3: Tall buildings

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response:

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response:

The London Borough of Enfield supports the principle of planning positively for tall buildings in appropriate locations and recognises the role that well-designed tall buildings can play in supporting sustainable growth and efficient use of land. However, the Council considers that Policy MBUL3 is not fully Justified, only partly Effective, and not fully Consistent with National Policy.

Does the Plan identify the key needs appropriately?
The policy appropriately identifies the need to:

- optimise the use of land in sustainable locations;
- direct tall buildings to suitable locations through plan-making;
- secure high-quality design;
- manage visual, environmental and operational impacts; and

- ensure tall buildings contribute positively to local character and London's wider skyline.

The Council supports these objectives.

However, the policy does not adequately recognise the need for locally derived definitions of what constitutes a tall building. A building below 30m may still be significantly taller than its context and have substantial townscape, heritage, design or placemaking impacts. The policy should therefore retain stronger flexibility for boroughs to identify locally appropriate thresholds through Local Plans and design codes.

Is the draft policy supported by proportionate and appropriate evidence?
The Council does not consider the policy to be fully Justified. The principal concern relates to the proposed increase in the definition of a tall building from 21m to 30m.

Whilst the evidence base and IIA assess the likely impacts of tall buildings and support directing such development to appropriate locations, the Council has not identified evidence demonstrating why 30m has been selected as the most appropriate threshold or why the existing 21m threshold should be replaced.

The IIA explicitly assesses Policy MBUL3 on the basis that tall buildings are defined as buildings over 30m. It identifies positive effects in relation to efficient use of land, economic potential, placemaking, health and the historic environment, whilst also identifying negative effects associated with embodied carbon and resource use. However, these assessments evaluate the effects of the policy after adoption of the 30m threshold; they do not explain why 30m is preferable to alternative thresholds.

The Council therefore considers that insufficient evidence has been provided to demonstrate that 30m is the most appropriate threshold across London's diverse urban contexts.

Have reasonable alternatives been considered?
The Council does not consider that reasonable alternatives have been fully assessed.

The IIA identifies only one reasonable alternative for Policy MBUL3, namely not identifying locations for metropolitan-scale tall buildings over 100m in height. Whilst this alternative tests the strategic approach to metropolitan-scale buildings, it does not assess alternatives to the general definition of a tall building.

The IIA therefore does not appear to assess:
- retention of the existing 21m threshold;
- alternative thresholds below 30m;
- borough-defined thresholds informed by local character and townscape evidence;
- a strategic benchmark approach that permits lower locally justified thresholds.

The Council therefore does not consider that the appraisal process demonstrates that the proposed 30m threshold represents the most appropriate option when compared to reasonable alternatives. This significantly weakens the justification for the policy.

Are there alternatives that should have been assessed?
The Council considers that the following alternatives should have been assessed through both the evidence base and the IIA:

- retaining the existing 21m threshold;
- introducing a lower threshold than 30m;
- allowing boroughs to establish locally justified thresholds through Local Plans and design codes;
- establishing 30m as a strategic benchmark whilst allowing boroughs to adopt lower thresholds where justified by local evidence.

These alternatives would have enabled a more robust assessment of the relative merits, impacts and delivery implications of different approaches and would have provided a more proportionate evidential basis for selecting a preferred option.

Can the Plan be delivered?
The Council does not contend that the policy is incapable of delivery. However, delivery is likely to depend heavily upon local viability, infrastructure capacity and development economics.

The viability evidence demonstrates that construction costs increase with building height owing to greater structural requirements, more intensive fire and servicing strategies, and increased construction complexity. The evidence also identifies viability challenges in a number of medium and higher-density residential typologies and notes that some seven-storey development scenarios are more challenging under particular affordable housing assumptions.

This does not mean that development between 21m and 30m is inherently unviable. However, it does demonstrate that height-related cost and delivery implications are material considerations which should form part of the justification for any change to the strategic threshold.

What barriers may affect implementation?
The Council considers the policy to be only partly Effective.

The principal implementation risk is that a fixed 30m threshold may exclude buildings that are locally significant in height terms from the policy framework, despite those buildings having substantial impacts on townscape, heritage, character or placemaking.

The evidence base, including the London Context Map methodology, recognises the considerable variation in London's urban contexts. A single city-wide threshold risks reducing the ability of boroughs to respond appropriately to local circumstances.

Implementation will also continue to depend on:
- local viability conditions;
- infrastructure capacity;
- character and townscape considerations;
- site-specific design assessment; and
- local planning policy frameworks.

The Council therefore considers that the policy would be more effective if it expressly enabled boroughs to define lower locally justified thresholds through Local Plans and design codes.

Is the Plan consistent with national policy?
The Council considers the policy is not fully Consistent with National Policy.

The NPPF supports optimisation and higher-density development where appropriate, but also requires planning authorities to consider local character, infrastructure, connectivity, design quality and local circumstances when determining appropriate forms and densities of development. The NPPF further supports plan-led approaches through masterplanning and design coding.

The Council considers that a fixed 30m threshold without express flexibility for boroughs to adopt lower locally justified thresholds gives insufficient weight to local evidence and place-specific circumstances.

Suggested Modification
The Council recommends either:
- retaining the existing 21m threshold; or
- amending the policy to clarify that 30m is a strategic London-wide benchmark and that boroughs may define lower locally justified thresholds through Local Plans, design codes, townscape assessments or character studies.

Suggested wording:
"For strategic London Plan purposes, a tall building is a building of 30 metres or more in height. Boroughs may define lower thresholds where justified by local evidence relating to character, townscape, heritage, design or development context. Buildings meeting either the strategic or local threshold should be assessed against the requirements of this policy."

Conclusion
The Council supports the principle of directing tall buildings to suitable locations. However, Policy MBUL3 is not fully sound because:
- it is not fully Justified, as neither the evidence base nor the IIA demonstrate why 30m is the most appropriate threshold or assess reasonable alternatives to that change;
- it is only partly Effective, because a fixed threshold may reduce the ability of boroughs to respond to local character and townscape considerations;

- • it is not fully Consistent with National Policy, which supports optimisation alongside local evidence, design quality and context-sensitive planning.

MBUL4: Utilities capacity, connectivity, and resilience

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response:

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response:

Enfield Council supports the objective of coordinating growth with utility infrastructure and strengthening capacity, resilience and connectivity. The Council also supports proactive utility planning aligned with housing growth, economic development and decarbonisation.

However, the Council considers that Policy MBUL4 is not fully Justified and is not currently demonstrated to be Effective.

Key needs
The Council agrees that the policy identifies important strategic needs, including:
- electricity-network capacity and resilience;
- water and wastewater infrastructure;
- decarbonisation of energy systems;
- climate resilience; and
- utility infrastructure required to support housing and economic growth.

However, the policy does not sufficiently recognise the cumulative infrastructure requirements associated with outer London growth locations, strategic industrial and logistics functions and high-energy-demand uses.

For Enfield, further evidence is required regarding the utility implications of growth at:
- Meridian Water;
- Crews Hill and Chase Park; and
- the Northern Lea Valley.

The Plan should give greater attention to:
- cumulative electricity demand from housing, industry, logistics and data centres;
- network-reinforcement requirements;

- water, wastewater and drainage capacity;
- land required for utility infrastructure;
- alignment with borough Infrastructure Delivery Plans; and
- the funding and phasing of infrastructure supporting strategic growth.

Justified
The Utilities Impact Assessment provides a useful strategic evidence base, but it does not currently demonstrate that the preferred approach is the most appropriate when considered against reasonable alternatives.

The assessment appears principally housing-led and does not clearly demonstrate that the cumulative effects of the following have been assessed together:
- housing growth;
- Green Belt Broad Locations for Growth;
- industrial Broad Locations for Growth;
- strategic employment growth;
- freight and logistics activity; and
- future data-centre demand.

The evidence identifies data centres as a potentially significant source of future electricity demand. However, it is not clear whether this demand has been integrated with the housing and economic-growth scenarios underpinning the Plan.

The evidence also does not demonstrate sufficiently how the infrastructure characteristics of outer London boroughs have informed the modelling. Enfield accommodates major regeneration programmes, strategic industrial and logistics functions, proposed Green Belt growth locations and increasing pressure from electricity-intensive uses.

The evidence reviewed does not demonstrate clearly how reasonable alternative utility scenarios were assessed, including:
- alternative distributions of growth;
- different levels of industrial and logistics growth;
- varying levels of data-centre and electricity-intensive development;
- alternative network-reinforcement programmes;
- delayed infrastructure investment; and
- alternative phasing assumptions.

Additional cumulative scenarios should be assessed to test whether the utility assumptions remain robust under plausible changes in demand, investment and delivery.

Effective
The Council is not currently satisfied that the evidence demonstrates a sufficiently clear and deliverable utility pathway for the proposed scale and distribution of growth.

Further clarity is required regarding:

- electricity-network reinforcement;
- water-supply and wastewater capacity;
- drainage infrastructure;
- land required for utility infrastructure;
- responsible delivery organisations;
- infrastructure phasing;
- funding and finance assumptions;
- alignment with growth trajectories; and
- implementation and monitoring arrangements.

The strategic viability evidence assumes that enabling infrastructure may be supported through government grant or low-cost finance. However, it does not demonstrate that the utility reinforcement required for individual Enfield growth locations has been comprehensively identified, costed, funded or programmed.

Standardised strategic allowances may support high-level testing, but they do not establish the deliverability of locations that may depend on substantial electricity, water, wastewater, drainage and site-wide infrastructure investment.

The policy and evidence should also identify the consequences for growth delivery if utility investment, grant funding or low-cost finance is delayed, reduced or unavailable.

Potential implementation barriers include:

- uncertainty regarding electricity capacity and reinforcement;
- increasing demand from data centres and strategic employment uses;
- uncertainty over infrastructure funding and delivery responsibilities;
- dependency on future utility-provider investment decisions;
- the timing and land requirements of strategic infrastructure; and
- mismatch between planned growth and utility-delivery timescales.

National policy

The Council's objection relates principally to the Justified and Effective tests. The Council does not contend that the policy's overall objective conflicts with national policy.

However, further evidence and policy clarity are required to demonstrate that the strategic infrastructure requirements, delivery mechanisms and reasonable alternatives expected by the August 2026 NPPF have been addressed proportionately.

Modifications sought

To make Policy MBUL4 sound, Enfield Council requests that the policy and supporting text be modified to:

- demonstrate that utility-capacity assumptions have been tested against cumulative residential, industrial, logistics and data-centre growth;

- identify utility requirements for Broad Locations for Growth and other strategic growth locations;
- explain the electricity, water, wastewater and drainage assumptions underpinning the growth strategy;
- identify delivery responsibilities, funding assumptions, phasing and monitoring arrangements;
- align utility planning assumptions with borough Infrastructure Delivery Plans and local evidence;
- demonstrate how the modelling reflects the requirements of outer London boroughs accommodating strategic industrial land, logistics activity and major regeneration;
- reconcile strategic viability testing with location-specific utility schedules and funding assumptions; and
- test the consequences for delivery if utility investment or supporting finance is delayed, reduced or unavailable.

Conclusion
Enfield Council supports better coordination between growth and utility infrastructure. However, Policy MBUL4 is not fully Justified because the evidence does not demonstrate sufficiently that cumulative demand, outer London circumstances and reasonable alternative infrastructure scenarios have informed the preferred approach.

The policy is also not currently demonstrated to be Effective because the required network reinforcement, land, delivery responsibilities, funding routes and phasing arrangements have not been established with sufficient clarity.

The Council therefore seeks the modifications above while retaining the policy's strategic objective.

MBUL5: Sustainable Transport to enable London's Growth

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response:

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response:

Enfield Council supports the objective of promoting sustainable transport, reducing car dependency, improving accessibility and aligning growth with transport infrastructure. The Council also supports transit-oriented development, active travel and infrastructure-led growth.

However, the Council considers that Policy MBUL5 is not fully Justified and is not currently demonstrated to be Effective.

Key needs
The Council agrees that the Plan identifies the strategic need to coordinate growth and transport planning and recognises the importance of sustainable transport investment.

However, the policy does not sufficiently reflect the transport characteristics and infrastructure requirements of outer London boroughs such as Enfield.
Enfield accommodates:

- major housing and regeneration locations;
- strategic industrial areas;
- freight and logistics functions;
- significant orbital and cross-borough travel;
- strategic road corridors; and
- proposed residential and industrial Broad Locations for Growth.

The policy should therefore place greater emphasis on the role of transport investment in supporting housing delivery, town-centre renewal, employment growth, industrial development and inward investment in outer London boroughs such as Enfield.

In particular, further consideration should be given to:

- outer London orbital travel patterns;
- freight and logistics movements;
- public transport capacity and accessibility;
- strategic road-network performance;
- the transport requirements of Broad Locations for Growth;
- the relationship between transport infrastructure and growth phasing; and
- transport investment required to support new jobs, industrial activity and economic growth.

Justified
The Strategic Transport Modelling provides valuable evidence about London-wide transport pressures. However, the evidence does not currently demonstrate that the preferred approach represents the most appropriate transport strategy for Enfield when considered against reasonable alternatives.
The evidence identifies:

- growth in trips across outer London;

- increasing pressure on transport networks;
- reductions in highway performance; and
- the need for future interventions and mitigation.

However, it does not clearly identify:

- the interventions required;
- where and when those interventions are needed;
- the effect of alternative intervention packages;
- how the interventions will be funded;
- who will deliver them; or
- how infrastructure delivery will be coordinated with housing, employment and industrial growth.

The modelling is strategic and identifies the need for further work to assess mitigation. It identifies transport challenges but does not yet demonstrate the transport pathway needed to support the growth assumptions associated with Crews Hill, Chase Park or the M25/A10 Northern Lea Valley.

This is important not only to housing delivery but also to the ability of these locations to support new employment, retain and attract businesses, accommodate strategic industrial and logistics functions and provide access to jobs.

The evidence reviewed does not demonstrate clearly how reasonable alternatives were assessed, including:

- alternative spatial distributions of housing and employment growth;
- alternative investment assumptions;
- alternative phasing linked to transport delivery;
- alternative mitigation packages;
- delayed transport improvements;
- lower public transport service assumptions; and
- different levels of freight, logistics and employment activity.

Without this assessment, the Council is unable to conclude that the preferred approach represents the most appropriate transport-led growth strategy.

Effective

The Council is not satisfied that the evidence demonstrates a sufficiently clear and deliverable transport pathway for the proposed scale and distribution of growth. Further evidence is required regarding:

- the transport interventions necessary to support the strategy;
- responsible delivery organisations;
- funding and finance routes;
- implementation timescales;
- delivery milestones;
- the relationship between transport, housing and employment growth;
- the relationship between infrastructure delivery and development phasing; and

- the consequences where interventions are delayed or delivered at a lower level than assumed.

This is particularly important for Crews Hill, Chase Park and the Northern Lea Valley, where strategic housing and employment growth would depend on transport investment that has not yet been fully identified, tested, funded or programmed.

The viability evidence indicates that improved accessibility, transport investment and strategic placemaking are important to the development model and that upfront funding may be needed for enabling infrastructure. The policy should not therefore treat housing or employment capacity as established solely on an assumption that later transport investment and value uplift will support delivery.

Failure to provide transport capacity at the required time could affect:

- housing build-out;
- business investment;
- access to employment;
- industrial and logistics activity;
- town-centre renewal;
- development viability; and
- the ability of growth locations to function as sustainable communities.

The principal implementation barriers include:

- reliance on interventions not yet fully identified or tested;
- uncertainty regarding funding and delivery responsibilities;
- pressure on strategic road networks;
- increasing freight and logistics demand;
- dependency on future investment decisions;
- viability implications if transport is delayed; and
- mismatch between development and transport-delivery timescales.

National policy

The Council's objection relates principally to the Justified and Effective tests. The Council supports the sustainable-transport objectives of MBUL5 and does not contend that those objectives are inherently inconsistent with national policy. However, further evidence is required to demonstrate that the transport infrastructure, delivery mechanisms and assessment of reasonable alternatives expected by the August 2026 NPPF have been addressed proportionately.

Modifications sought

To make Policy MBUL5 sound, Enfield Council requests that the policy and supporting text be modified to:

- identify the transport assumptions underpinning Broad Locations for Growth;
- set out the interventions, funding arrangements and delivery mechanisms required to support the spatial strategy;
- identify delivery responsibilities, timescales, milestones and phasing;

- explain how strategic modelling informed Enfield-specific housing and employment growth assumptions;
- clarify the transport assumptions for Crews Hill, Chase Park and the M25/A10 Northern Lea Valley;
- demonstrate that the evidence reflects outer London freight, logistics, strategic-road and orbital travel requirements;
- explain how transport investment will support access to jobs, industrial activity, town-centre renewal and wider economic growth;
- provide greater transparency regarding alternative transport, growth and mitigation scenarios;
- identify the upfront transport funding and finance assumptions relied upon by the strategic growth and viability evidence; and
- include a downside scenario where transport investment is delayed, reduced or delivered at a lower level than assumed.

Conclusion
Enfield Council supports sustainable and infrastructure-led transport planning. However, Policy MBUL5 is not fully Justified because the evidence does not demonstrate sufficiently that reasonable alternative growth, investment, phasing and mitigation scenarios have been assessed.

The policy is also not currently demonstrated to be Effective. The supporting evidence identifies transport pressures but does not establish the interventions, funding, implementation responsibilities or delivery pathway required to support Enfield's strategic growth locations, housing delivery ambitions, industrial and logistics functions, job creation and wider economic growth objectives.

The Council therefore seeks the modifications above while retaining the policy's sustainable-transport objective.

MBUL6: Design for a growing, changing city

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response:

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response:

The London Borough of Enfield supports the overall objectives of Policy MBUL6 and welcomes its emphasis on high-quality, inclusive and sustainable design. The policy appropriately identifies the need for development to respond positively to local character, environmental quality, accessibility, public realm, health and wellbeing, and successful placemaking. The supporting evidence and Integrated Impact Assessment identify significant positive placemaking outcomes and wider benefits relating to health, equality and environmental quality.

However, the Council considers that Policy MBUL6 is only partly Effective because it does not provide sufficient clarity regarding how its design-led objectives should be balanced against the optimisation requirements established elsewhere in the Plan, particularly Policies MBUL2 and MBUL3.

The Council strongly supports the policy's emphasis on neighbourhood character, built form, layout, materials, environmental quality and management of impacts such as daylight, sunlight, wind and overheating. These are fundamental components of successful placemaking and should remain central to decision-making. The Integrated Impact Assessment highlights these benefits and concludes that the policy is expected to have significant positive effects in relation to successful placemaking.

The Council considers that the policy identifies the key needs appropriately and is broadly supported by proportionate evidence. However, additional emphasis is required to recognise the challenges of implementation in Outer London boroughs such as Enfield, where there is significant variation in urban character, ranging from metropolitan growth locations and estate renewal areas through to established suburban neighbourhoods with distinctive townscape characteristics.

In many parts of Enfield, local character, infrastructure capacity, viability, quality of accommodation and heritage considerations may indicate a lower development quantum than that implied by the optimisation framework. Whilst optimisation is supported in principle, the Council is concerned that the policy does not sufficiently clarify that development capacity should be determined through a genuinely design-led process and that optimisation should not be treated as a driver of development form in its own right.

The Council therefore considers that the relationship between Policies MBUL2, MBUL3 and MBUL6 requires further clarification. In particular, the Plan should explicitly confirm that optimisation of site capacity should not come at the expense of high-quality placemaking, quality of accommodation, environmental quality, local character, heritage significance or other locally evidenced design considerations.

This concern is consistent with the August 2026 NPPF, which places significant emphasis on context-led design, locally derived design expectations, masterplanning and design coding. Policies DP1 and DP2 require design expectations to be informed

by an area's existing characteristics, wider context and local aspirations, whilst Policy DP3 requires development proposals to respond positively to their context and integrate with and enhance their surroundings. Policies L1 and L3 similarly recognise that optimisation and increased density should take account of local character, infrastructure capacity, market conditions and the importance of securing well-designed places.

The Council does not consider that the policy is unsupported by evidence, nor that reasonable alternatives have not been considered. Rather, the concern relates to the effectiveness of implementation and the potential for conflict between optimisation objectives and place-led design outcomes if greater clarity is not provided.

The Council therefore recommends that Policy MBUL6, or its supporting text, be amended to make clear that:

- optimisation of site capacity should be achieved through a design-led approach and should not come at the expense of high-quality placemaking, quality of accommodation, environmental quality, local character or heritage significance; and
- boroughs may continue to apply locally adopted design guidance, character assessments, masterplans and design codes in determining appropriate development form, scale and massing.

These amendments would improve the effectiveness and deliverability of the policy whilst remaining consistent with the supporting evidence base and national policy.

MBUL7: London Heritage

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response:

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response:

The London Borough of Enfield supports the overall direction of Policy MBUL7 and welcomes the streamlined approach taken in comparison with the current London Plan. Given the introduction of the National Decision-Making Policies within the August 2026 NPPF, the reduced scope of the policy is generally appropriate and avoids unnecessary duplication of national policy.

The policy appropriately identifies the importance of conserving and enhancing London's historic environment and the contribution heritage assets make to placemaking, local character and sustainable growth. The Council does not consider that additional evidence or alternative strategic approaches are required in relation to the overall objectives of the policy.

However, the Council considers that Policy MBUL7(G) is not fully Consistent with National Policy and is only partly Effective.

Policy MBUL7(G) introduces a presumption in support of certain forms of development where there is an "appropriate balance" with conserving the significance of a heritage asset. The Council is concerned that this wording introduces ambiguity because it does not clearly explain how that balance should be assessed.

In particular, the policy does not refer to:
- the significance of the heritage asset;
- the contribution made by setting to significance;
- the degree of harm;
- the distinction between substantial and less-than-substantial harm;
- the weighting to be applied to public benefits; or
- the statutory duties contained within the Planning (Listed Buildings and Conservation Areas) Act 1990.

These matters are already addressed through the NPPF heritage policies, which establish a clear framework for assessing effects on designated and non-designated heritage assets, including the requirement to assess significance, setting, the degree of harm and the balancing of harm against public benefits.

The Council considers that the introduction of a separate "appropriate balance" test risks creating uncertainty and inconsistency in the application of heritage policy. Decision-makers, applicants and communities could reach different conclusions regarding what constitutes an appropriate balance, particularly where heritage harm is identified.

The Council therefore considers that the policy would be more effective, and more consistent with national policy, if Policy MBUL7(G) either:
- explicitly cross-referenced the heritage assessment framework established through the NPPF; or
- was deleted on the basis that the NPPF already provides a comprehensive and well-established mechanism for balancing heritage impacts against the benefits of development.

Suggested Modification
Amend Policy MBUL7(G) to expressly state that any balancing exercise must be undertaken in accordance with the heritage policies of the NPPF and relevant statutory duties.

Alternatively, remove the reference to an "appropriate balance" and rely upon the heritage assessment framework already established through Chapter 20 of the NPPF.

This would improve clarity, avoid duplication, and ensure consistent application of heritage policy across London.

MBUL8: Inclusive Design

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response:

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response:

The London Borough of Enfield strongly supports the objectives of Policy MBUL8 and welcomes the policy's commitment to creating places, buildings and public spaces that are accessible, inclusive and usable by all. The policy appropriately identifies the need to embed inclusive design throughout the planning, design and development process and responds positively to the needs of London's diverse population.

The Council considers that the policy is generally supported by proportionate and appropriate evidence. The Integrated Impact Assessment identifies positive effects in relation to housing quality, economic participation, successful placemaking, health and community safety, and concludes that the policy is expected to have a significant positive effect in relation to equality of opportunity. The Equality Impact Assessment similarly recognises the benefits of reducing physical, cultural and psychological barriers to participation.

However, the Council considers that Policy MBUL8 is only partly Effective because it does not place sufficient emphasis on meaningful engagement with diverse user groups throughout the design process and does not provide a mechanism for evaluating whether inclusive design outcomes have been successfully achieved once development is occupied and in use.

The supporting evidence places considerable emphasis on understanding and responding to the needs of London's diverse population. The Integrated Impact Assessment notes the importance of designs being informed by diverse views and of identifying and addressing physical, cultural and psychological barriers to inclusion.

It also relies upon Design and Access Statements demonstrating how proposals have considered the needs of different users.

The Council considers that the policy would be more effective if applicants were expected to demonstrate meaningful engagement with a diverse range of users, particularly:

- disabled people;
- older people;
- children and young people;
- people with caring responsibilities; and
- other groups who may experience barriers in accessing and using the built environment.

Inclusive design is most successful when informed directly by lived experience. Early and meaningful engagement can help identify barriers that may not be apparent through conventional design processes and can improve both design quality and long-term usability.

The Council also considers that there is a missed opportunity to promote post-occupancy evaluation. Whilst the policy focuses appropriately on design and approval stages, it does not encourage review of whether completed developments are functioning as intended once occupied and managed in practice. Post-occupancy evaluation would help create a stronger evidence base for continual improvement and support accessibility and inclusion objectives over the lifetime of development.

The Council's proposed modification is also consistent with national policy. The August 2026 NPPF places considerable emphasis on community engagement, inclusion and user-centred design. Policies DP1 and DP2 require design expectations, design codes and masterplans to be informed by proactive engagement and local aspirations, whilst Policy HC4 specifically recognises the importance of engaging users in the design of facilities so that developments are inclusive and reflect user needs.

The Council therefore recommends that Policy MBUL8, or its supporting text, be amended to:

- strengthen expectations for meaningful engagement with diverse user groups during the design and development process; and
- • encourage post-occupancy evaluation of inclusive design outcomes for major developments, together with implementation of reasonable management and operational improvements identified through that process.

MBUL9: Healthy Streets and Public Realm

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response:

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response:

The London Borough of Enfield supports the overall objectives of Policy MBUL9 and welcomes the emphasis on Healthy Streets, active travel, accessibility, public realm quality and inclusive movement networks.

The policy appropriately identifies the need to create healthier, safer and more attractive streets and public spaces and is supported by a strong evidence base. However, the Council considers that the policy is only partly Effective because it does not sufficiently recognise the relationship between Healthy Streets outcomes, the Sustainable Access Measure (SAM) and the Optimisation Framework.

The Council strongly supports the Healthy Streets Approach. However, in practice, achieving successful Healthy Streets outcomes becomes increasingly important as density and development intensity increase. Higher-density development places greater demands on public realm, walking and cycling infrastructure, green infrastructure, public open space and wider movement networks. These locations often require significantly higher levels of design quality, mitigation and public realm investment in order to maintain a high-quality environment and support larger resident and visitor populations.

The Council is concerned that the Plan does not clearly explain how the Healthy Streets Approach is expected to operate alongside the Optimisation Framework and SAM. In growth locations, public realm and Healthy Streets improvements are not simply desirable outcomes; they are often essential infrastructure required to support additional density and development intensity.

The policy would therefore be more effective if it made clear that higher-density development should be supported by proportionately higher expectations regarding:

- public realm quality;
- green and blue infrastructure;
- active travel infrastructure;
- accessibility;
- streetscape improvements; and
- high-quality ground-floor design and place-making.

The Council also considers that the supporting text should provide a clearer explanation of the relationship between the Healthy Streets Approach, the Sustainable Access Measure and the Optimisation Framework, emphasising that

optimisation should be accompanied by public realm improvements that are appropriate to the scale and intensity of development proposed.

Suggested Modification
Amend Policy MBUL9 or its supporting text to make clear that:

"Development seeking to optimise site capacity through increased density or intensity of use should demonstrate how it delivers a commensurate improvement in public realm quality, Healthy Streets outcomes, active travel infrastructure, accessibility and green infrastructure."

This would improve the effectiveness of the policy and provide greater certainty that optimisation and growth will be supported by the high-quality environments necessary to sustain them.

MBUL10: Security and safety

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response:

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response:

Enfield Council supports the overall objective of Policy MBUL10 and agrees that safety, security and resilience are important planning considerations. The Council recognises the importance of designing safe places, addressing crime and the fear of crime, protecting vulnerable groups and ensuring that development takes account of risks associated with major hazards, public safety and security.

However, the Council considers that further clarification is required to ensure that the policy remains appropriate, effective and consistent with national policy, particularly in relation to the respective roles of strategic planning policy, local planning policy and other regulatory regimes.

Does the Plan identify the key needs of the area appropriately?
The Council considers that the policy appropriately identifies the strategic need to address safety, security and resilience through the planning process and broadly reflects the issues identified through the supporting evidence and Integrated Impact Assessment.

The policy appropriately recognises:

- public safety and resilience;
- crime prevention;
- the needs of women, girls and vulnerable groups;
- counter-terrorism and security considerations; and
- risks associated with major hazard infrastructure and locations where large numbers of people gather.

These are important strategic issues for London and are broadly consistent with national policy.

Are there additional needs that should be addressed?
The Council does not consider that significant additional strategic issues need to be addressed through this policy.

However, the Council considers that greater clarity is required regarding the distinction between:
- strategic planning considerations;
- detailed design and development management matters;
- Building Regulations requirements;
- fire safety legislation; and
- other regulatory regimes relating to safety and security.

Is the draft policy supported by proportionate and appropriate evidence?
The Council considers that the policy is generally supported by proportionate evidence, including the findings of the Integrated Impact Assessment.

However, the Council is not satisfied that the supporting evidence clearly demonstrates why certain elements of the policy require additional London Plan policy intervention beyond matters already addressed through national policy and other regulatory frameworks.

Further explanation would assist in demonstrating that all elements of the policy are necessary and genuinely strategic in nature.

Have reasonable alternatives been considered?
The Council notes that the Integrated Impact Assessment identifies no reasonable alternatives to the policy approach.

Given the strategic nature of the policy and the broad objective of improving safety and security outcomes, the Council has no substantive objection regarding the consideration of alternatives.

Are there alternatives that should have been assessed?
The Council does not identify any specific alternative strategic approaches that should have been assessed.

However, the Council considers that greater clarity should be provided regarding the intended relationship between planning policy requirements and existing regulatory regimes.

Can the Plan be delivered?
The Council considers that the policy is capable of being implemented through development management processes and through ongoing engagement with relevant agencies, including:

- the Metropolitan Police;
- Counter Terrorism Security Advisors;
- the London Fire Commissioner; and
- other public safety organisations.

However, the effectiveness of the policy would be improved by clearer delineation between planning requirements and matters addressed through other controls and legislation.

What barriers may affect implementation?
Potential barriers to implementation include:

- evolving national fire safety requirements;
- changes to national security and counter-terrorism guidance;
- overlap between planning and other regulatory regimes;
- resource constraints within specialist agencies; and
- uncertainty regarding the respective responsibilities of planning authorities and other regulators.

These issues do not undermine the overall objective of the policy but could create uncertainty during implementation.

Is the Plan consistent with national policy?
The Council considers that the overall direction of the policy is broadly consistent with the August 2026 National Planning Policy Framework, particularly Policy P5 relating to public safety and security.

However, the Council notes that the NPPF requires Spatial Development Strategies to remain genuinely strategic in nature and not duplicate matters addressed through national policy or other regulatory regimes. Policies should avoid unnecessary duplication and should not extend controls already exercised through separate regulatory frameworks.

The Council therefore considers that further clarification is required to ensure that MBUL10 remains focused on strategic planning matters and does not duplicate requirements addressed through:

- Building Regulations;
- fire safety legislation;
- security and counter-terrorism requirements; or
- other regulatory controls.

Modifications Sought
To make Policy MBUL10 sound, Enfield Council requests that the policy and supporting text be modified to:

1. Clarify the strategic purpose of the policy and distinguish between strategic planning considerations and detailed development management matters.
2. Clarify the relationship between MBUL10 and national policy relating to public safety and security.
3. Clarify the respective roles of planning policy, Building Regulations, fire safety legislation and other regulatory regimes.
4. Confirm that the policy is not intended to duplicate or extend controls exercised through separate regulatory frameworks.

Conclusion
Enfield Council supports the overall objective of Policy MBUL10 and recognises the importance of promoting safe, secure and resilient places. However, the Council considers that further clarification is required to ensure that the policy remains genuinely strategic in nature, avoids unnecessary duplication with national policy and other regulatory regimes, and is therefore fully consistent with the requirements of the August 2026 NPPF.

Chapter 3: Delivering the homes and neighbourhoods (HN) Londoners need

HN1: Increasing London's housing stock

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response

Policy HN1 is not fully Appropriate or Effective and is not fully Consistent with National Policy.

Enfield Council supports the objective of increasing London's housing stock and does not object to the draft London Plan establishing an overall housing requirement for each London borough.

However, the Council considers that Policy HN1 is not fully Appropriate, is not currently demonstrated to be Effective, and is not fully Consistent with National Policy.

The Council's concerns relate to:

- the status of the separate brownfield and greenfield figures in Table 3.1;
- the absence of a clear definition of "greenfield";
- the relationship between the component figures and Enfield's overall housing requirement;
- the evidence supporting Enfield's 7,000-home greenfield component;
- the relationship between HN1, PV7 and Enfield's emerging Local Plan;
- the lack of a sufficiently clear delivery pathway; and
- the resulting overall housing requirement of 21,062 homes.

The Council's principal concern is the proposed 7,000-home greenfield component attributed to Enfield.

The draft London Plan does not explain sufficiently:

- how the 7,000-home figure has been derived;
- how it relates to the evidence supporting Enfield's emerging Local Plan;
- how double counting has been avoided;

- whether assumptions associated with the New Towns Programme have informed the figure; or
- how this level of growth would be delivered within the proposed timeframe.

The Council therefore considers that the 7,000-home component should either be justified through a transparent borough-specific evidence base and delivery strategy or be replaced by the currently evidenced Local Plan trajectory of 3,405 homes.

Policy HN1 is not fully Consistent with National Policy
Policy HO2(1) of the August 2026 NPPF states that Spatial Development Strategies should establish a housing requirement, and set pitch and plot requirements where a need has been identified, for each local planning authority within the strategy area. HO2(4) confirms that pitch and plot requirements relate to the accommodation needs of travellers.

The London Plan is a Spatial Development Strategy and must be prepared in accordance with the NPPF. Annex A of the NPPF expressly states that Spatial Development Strategies should be produced in accordance with the Framework.

Table 3.1 of the draft London Plan identifies, for each London planning authority:
- a brownfield housing target;
- a greenfield housing target; and
- a total housing target.

Greenfield housing figures are substantive for only eight London boroughs, including Enfield.

National policy refers to a housing requirement for each local planning authority. It does not expressly address whether a Spatial Development Strategy may divide that requirement into separate brownfield and greenfield components.

Enfield Council does not contend that the London Plan is prevented from identifying the anticipated spatial sources of housing supply. However, the Plan must identify clearly the single operative housing requirement for each borough and explain the status of any component figures used to derive or spatially express that requirement.

Table 3.1 appears to establish three separate figures for each borough:
- a brownfield housing figure;
- a greenfield housing figure; and
- a total housing figure.

The London Plan does not clearly explain the status of these figures or how they should be applied in practice.

In Enfield's view, the total figure should be the single operative housing requirement for the purposes of Policy HO2 and the Housing Delivery Test.

The brownfield and greenfield figures should not operate as separate housing requirements. Instead, they should be clearly described as indicative spatial assumptions showing how the total housing requirement is expected to be delivered.

If the brownfield and greenfield figures are intended to have a different status, the Plan should explain:

- how they will be monitored;
- whether there are consequences for under-delivery;
- whether delivery in one category can compensate for lower delivery in the other; and
- how they interact with borough Local Plans and the Housing Delivery Test.

Without this clarification, it is difficult to understand how the figures are intended to operate or how success against the housing requirement will be measured.

Enfield Council considers that the total housing figure in Table 3.1 should be identified as the single operative housing requirement for the purposes of Policy HO2. Any brownfield and greenfield components should be described clearly as indicative spatial or supply assumptions rather than separate housing requirements.

Housing Delivery Test implications
This distinction has practical implications.

Annex D of the NPPF states that the Housing Delivery Test measures net homes delivered in a local authority area against the homes required, using national statistics and local authority data. It establishes defined policy consequences where delivery falls below specified percentages of the housing requirement.

HN1 does not explain:

- whether the Housing Delivery Test would apply only to Enfield's total housing requirement;
- whether delivery against the brownfield and greenfield components would be monitored separately;
- whether separate consequences would arise from failing to meet one component;
- whether one component could compensate for under-delivery in the other; or
- what would happen if Enfield met its overall requirement through a different spatial distribution of housing supply.

If the brownfield and greenfield components are intended to operate as separate requirements, their relationship with Policy HO2 and Annex D requires explanation.

If the component figures are targets without separate consequences, their purpose, status and operation should be clarified. Without this clarity, they are unlikely to operate effectively.

Use of "housing target"

The terminology in the draft London Plan should also be aligned more closely with the NPPF.

The NPPF uses the term housing requirement for the figure established by a Spatial Development Strategy for each local planning authority. Table 3.1 instead uses the term housing target.

The London Plan may use component targets for explanatory or monitoring purposes. However, Table 3.1 and its supporting text should identify clearly which figure constitutes Enfield's operative housing requirement under Policy HO2.

The meaning of "greenfield" is unclear
Policy HN1 and Table 3.1 establish a "greenfield" housing target, but the term "greenfield" is not defined in the draft London Plan glossary.

It is also not a defined term in the August 2026 NPPF, which separately defines Green Belt, grey belt and previously developed land.

It is therefore unclear whether "greenfield" means:

- land currently within the Green Belt;
- all undeveloped land;
- undeveloped land outside the Green Belt;
- land whose status is fixed at the London Plan base date; or
- land that remains within the Green Belt at the point of delivery.

This distinction is particularly important in Enfield because the emerging Local Plan proposes the release of land at Crews Hill and Chase Park.

The London Plan should explain:

- how land released through an adopted borough Local Plan would be classified;
- whether the greenfield classification changes following Local Plan adoption;
- how housing already included in an adopted or emerging Local Plan trajectory is treated;
- whether the component applies to land rather than the policy designation applying to it; and
- how double counting between the London Plan and Enfield Local Plan trajectories will be avoided.

If "greenfield" is intended to mean Green Belt, the London Plan should use the established term Green Belt. If it has a wider or different meaning, the term should be defined expressly.

Without this clarification, the greenfield component cannot be interpreted, monitored or applied consistently.

Policy HN1 is not fully Appropriate having regard to the scale of the housing requirement set for Enfield

PM14 of the NPPF states that a sound Spatial Development Strategy should set out an Appropriate strategy to enable the delivery of sustainable development, taking into account reasonable alternatives, infrastructure and other relevant strategies.

PM8 requires plans to be underpinned by information and data that are relevant to the matters being considered, proportionate, drawn from suitable and reliable sources and sufficiently up to date. Evidence relating to development needs should use sufficiently up-to-date information and data.

Enfield Council has not identified a sufficiently transparent and Enfield-specific evidence trail explaining:

- how the 7,000-home greenfield component was derived;
- why 7,000 is the most appropriate figure;
- the precise geographical area to which it relates;
- how it relates to the capacities of Crews Hill and Chase Park;
- how it reflects Enfield's emerging Local Plan evidence and housing trajectory;
- whether the homes are additional to those already included in Enfield's trajectory;
- how double counting will be avoided; or
- how reasonable alternative housing and delivery scenarios were assessed.

Withdrawal from the New Towns Programme

On 28 May 2026, Enfield Council formally withdrew its participation, and land at Crews Hill and Chase Park, from the Government's New Towns Programme.
This does not determine the planning merits or ultimate development capacity of the area. However, it is directly relevant to the assumptions underpinning the 7,000-home greenfield component.

If any part of the 7,000-home figure relies upon assumptions associated with a Government-designated New Town, New Town delivery mechanisms, public-sector intervention, infrastructure funding arrangements, land assembly powers or other delivery structures associated with the New Towns Programme, those assumptions should be reviewed and updated following the Council's withdrawal.

The draft London Plan continues to refer, including on page 302, to the potential new town at Crews Hill.

The London Plan should therefore distinguish clearly between:

- a potential Government-designated New Town;
- the identification of Crews Hill and Chase Park as a London Plan Broad Location for Growth; and
- development being brought forward through Enfield's statutory Local Plan.

Any housing capacity or delivery assumption based on a Government-designated New Town should be reviewed in light of the Council's withdrawal from the programme and the current absence of a designated New Town in Enfield.

The Council therefore requests that the GLA explain:

- whether the 7,000-home figure is dependent upon any New Town assumptions;
- how those assumptions have been adjusted following Enfield's withdrawal from the programme;
- what delivery model is now assumed; and
- how the revised assumptions relate to Enfield's examined Local Plan evidence.

Relationship with the emerging Enfield Local Plan

The draft London Plan spatial strategy identifies Crews Hill and Chase Park as a Broad Location for Growth for Green Belt residential-led mixed-use development.

The Enfield Local Plan is at an advanced stage of examination. It proposes development within the Crews Hill and Chase Park placemaking area, including through Policies PL10 and PL11 and site allocations SA10.1 to SA10.5 and SA11.1 to SA11.6.

The Enfield Local Plan is expected to reach adoption before the next London Plan. The London Plan must therefore take account of this advanced plan-making position and explain:

- how the Enfield Local Plan trajectory has informed Table 3.1;
- whether the 7,000 homes include housing already identified through the Enfield Local Plan;
- whether the figure assumes development additional to the emerging Local Plan;
- how double counting will be avoided; and
- how the London Plan figure relates to the capacity and delivery period of each location.

PM1 of the NPPF states that Spatial Development Strategies should be genuinely strategic, identify broad locations for growth and regeneration, and allow more detailed matters to be considered through other parts of the development plan. PM1 also states that broad locations identified by an SDS should extend over strategic site allocations in adopted Local Plans.

PM2 states that Local Plans should set out specific proposals for accommodating development needs at the local level, including allocations and infrastructure requirements.

HN1 should therefore establish strategic direction without predetermining the detailed spatial distribution, individual allocations, Green Belt boundary changes or realistic capacity that remain matters for the borough Local Plan.

Enfield's 7,000-home greenfield component is not adequately justified
Policy HN1 attributes Enfield a greenfield housing component of 7,000 homes over the ten-year period.

Paragraph 3.13 states that, for boroughs with a greenfield component, the housing requirement for 2027/28 to 2029/30 would comprise the annualised brownfield component only.

The 7,000-home greenfield component would therefore need to be delivered over the seven years from 2030/31 to 2036/37. This equates to an average of 1,000 homes annually from the relevant locations.

The 7,000-home figure is presented as a round number. The draft London Plan and its evidence base do not provide a sufficiently transparent Enfield-specific derivation of that figure.

The evidence also does not demonstrate that delivery of 1,000 homes annually from the relevant locations is realistic, taking account of:

- Local Plan preparation and examination;
- the identification and allocation of sites;
- comprehensive masterplanning;
- infrastructure planning and implementation;
- land assembly;
- utilities reinforcement;
- environmental mitigation;
- planning and technical approvals;
- affordable housing requirements;
- housing-market absorption;
- delivery funding; and
- governance and stewardship arrangements.

Enfield's evidenced housing trajectory
Enfield's housing trajectory, drawing on the evidence submitted and tested through the examination of the Enfield Local Plan, forecasts delivery of 3,405 homes during 2027/28 to 2036/37:

- 1,595 homes at Chase Park; and
- 1,810 homes at Crews Hill.

The draft London Plan does not explain adequately why this evidence has been displaced by a 7,000-home figure or provide a transparent derivation of that higher figure.

Nor does it explain how the 7,000-home figure should be reconciled with the evidence currently before the Inspector examining the Enfield Local Plan.

The Council's concern is not simply that the figure is higher, but that the basis for departing from the examined trajectory has not been explained, evidenced or tested transparently.

The Council does not contend that 3,405 homes must represent the maximum long-term development capacity of Crews Hill and Chase Park. However, it is the delivery figure currently supported by the detailed evidence and trajectory tested through Enfield's Local Plan examination for the relevant ten-year period.

The 7,000-home component is therefore not demonstrated to represent the most appropriate strategy for Enfield when considered against the available borough-specific evidence and reasonable alternatives.

Reasonable alternatives have not been demonstrated sufficiently
The Council has not identified sufficient evidence demonstrating that reasonable alternatives to the 7,000-home greenfield component have been assessed transparently.

The following alternatives should be considered:

- a component aligned with Enfield's emerging Local Plan trajectory;
- lower and phased capacity scenarios;
- different balances between brownfield development, small sites, intensification and Green Belt growth;
- infrastructure-led phasing;
- alternative transport and utilities investment assumptions;
- delayed or reduced grant and public funding;
- slower market absorption;
- different housing-mix assumptions;
- different delivery models following Enfield's withdrawal from the New Towns Programme; and
- capacity based on realistic net developable areas after infrastructure, environmental mitigation and Green Belt enhancement land are taken into account.

The alternatives should be assessed against:

- housing delivery;
- infrastructure requirements;
- viability;
- environmental effects;
- market absorption;
- deliverability;
- funding requirements; and
- the relationship with Enfield's emerging Local Plan.

The preferred approach should be demonstrated to be the most appropriate strategy, rather than simply the highest strategic capacity scenario.

Policy HN1 is not currently demonstrated to be Effective

PM14 states that an Effective Spatial Development Strategy should establish effective policies and provide a reasonable prospect that Local Plans will be capable of identifying site allocations to implement the spatial strategy. Where a strategy anticipates changes in market conditions that it is intended to foster, a proportionate approach may be taken to longer-term assumptions, supported by post-adoption monitoring.

The Council is not satisfied that there is currently a reasonable prospect that Enfield's Local Plan could identify and deliver the full 7,000-home greenfield component within the period assumed by HN1.

Delivery would depend on:

- rail, bus and highway improvements;
- utilities reinforcement;
- land assembly;
- comprehensive masterplanning;
- environmental mitigation;
- affordable housing grant;
- low-cost finance;
- public-sector leadership;
- appropriate delivery and stewardship arrangements; and
- sustained housing-market absorption.

HN1 and its supporting evidence do not identify sufficiently:

- the lead delivery organisation;
- committed funding and finance routes;
- infrastructure programmes and milestones;
- land-assembly arrangements;
- responsibility for financial and delivery risks;
- the relationship between infrastructure and housing phasing;
- the effect of Enfield's withdrawal from the New Towns Programme on the assumed delivery model; or
- an Enfield-specific trajectory demonstrating how 7,000 homes would be delivered.

PM1 requires Spatial Development Strategies to provide a proportionate level of information on the mechanisms for delivering their strategy and to identify the broad location and extent of the strategic infrastructure needed to enable development. HO3 requires Local Plans to identify a sufficient supply and mix of sites to meet or exceed the housing requirement and to provide a trajectory showing the expected rate of delivery. HO4 requires Local Plans dealing with strategic housing-led development to make a realistic assessment of likely delivery rates and identify opportunities to support implementation.

The Council's concern is that this level of delivery has not been demonstrated through a sufficiently Enfield-specific infrastructure, viability, transport, utilities, phasing and governance framework.

Barriers to implementation

The principal barriers include:

- transport funding and delivery;
- utilities capacity and reinforcement;
- fragmented ownership and land assembly;
- infrastructure costs and delivery timescales;
- biodiversity, landscape and heritage mitigation;
- flood risk and drainage;
- affordable housing requirements and grant availability;
- access to low-cost finance;
- public-sector delivery capacity;
- market absorption;
- delivery-body and stewardship arrangements;
- Local Plan preparation and examination timescales; and
- uncertainty regarding responsibility for delivery and financial risk.

These matters do not necessarily preclude strategic growth, but they materially affect the scale and timing of deliverable housing capacity and should be reflected in HN1 and Table 3.1.

Modifications sought

The Council's primary request is that the GLA either:

- publish the evidence, assumptions and delivery pathway supporting the 7,000-home greenfield component; or
- align the greenfield component with the currently evidenced trajectory of 3,405 homes.

To make Policy HN1 sound, Enfield Council therefore requests that Policy HN1, Table 3.1 and their supporting text be modified to:

1. Identify a single operative borough requirement
    - Identify the total figure as the single housing requirement for each borough for the purposes of Policy HO2.
2. Clarify the status of component figures
    - Confirm that the brownfield and greenfield figures are indicative spatial or supply assumptions rather than separate housing requirements.
    - Explain their intended monitoring arrangements and policy consequences.
3. Define "greenfield"
    - Define the term and distinguish it clearly from Green Belt, grey belt and previously developed land.
    - If "greenfield" means Green Belt, use the established term consistently.
4. Clarify the relationship with borough Local Plans

- Explain how land released or proposed for release through borough Local Plans is treated.
- Confirm that detailed allocations, Green Belt boundaries, infrastructure requirements and realistic capacity remain matters for borough Local Plans.

5. Avoid double counting
   - Explain how housing already included in Enfield's emerging Local Plan trajectory has been treated in deriving the 7,000-home component.
6. Publish the supporting evidence
   - Provide the methodology, geographical assumptions and evidence supporting the 7,000-home figure.
   - Explain why that figure represents the most appropriate strategy when considered against reasonable alternatives.
7. Demonstrate deliverability
   - Undertake an Enfield-specific assessment of infrastructure, viability, transport, utilities, land assembly, phasing, market absorption, environmental mitigation and governance.
8. Clarify the delivery model
   - Explain the implications of Enfield's withdrawal from the New Towns Programme.
   - Identify the alternative delivery arrangements, funding and governance relied upon.
9. Provide monitoring and review
   - Include a review mechanism where assumed infrastructure, funding, finance, market conditions or public-sector interventions do not materialise.

Unless the 7,000-home greenfield component can be justified and demonstrated to be deliverable, Enfield Council requests that it be replaced by the evidenced emerging Local Plan trajectory of 3,405 homes from the relevant locations during 2027/28 to 2036/37.

On that basis, Enfield's overall ten-year housing requirement should reduce by 3,595 homes, from 21,062 to 17,467 homes.

Conclusion
Enfield Council supports the London Plan establishing a housing requirement for each borough and supports increasing London's housing stock.

However, HN1 is not fully Appropriate because the 7,000-home greenfield component is not supported by sufficiently transparent, proportionate and Enfield-specific evidence, or demonstrated to represent the most appropriate strategy when considered against reasonable alternatives.

HN1 is not currently demonstrated to be Effective because the infrastructure, funding, land assembly, phasing, governance and delivery arrangements required to achieve 7,000 homes have not been established. There is insufficient evidence of the reasonable prospect of Local Plan implementation required by PM14.

HN1 is not fully Consistent with National Policy because it does not distinguish sufficiently clearly between Enfield's single operative housing requirement under HO2 and the separate brownfield and greenfield component figures in Table 3.1. It does not explain how those component figures relate to the Housing Delivery Test, clearly define "greenfield", or properly distinguish between the strategic role of the London Plan and the detailed role of the borough Local Plan.

Because the 7,000-home greenfield component is not adequately justified, is not aligned with the evidence currently supporting Enfield's emerging Local Plan, and has not been demonstrated to be deliverable, the resulting overall housing requirement for Enfield is also not adequately justified.

The Council therefore requests that the GLA either:

- publish the evidence, assumptions and delivery pathway supporting the 7,000-home component; or
- replace the 7,000-home component with the currently evidenced Local Plan trajectory of 3,405 homes.

Unless the 7,000-home component can be robustly justified and demonstrated to be deliverable, Enfield's overall housing requirement should reduce from 21,062 homes to 17,467 homes.

HN2: Protecting and reshaping housing

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response

Enfield Council supports the overall objectives of Policy HN2, including protecting existing housing and appropriately managing changes of use, redevelopment and housing loss.

However, the Council considers that the policy is only partly Effective because its relationship with the Vacant Building Credit provisions in national policy is unclear. Policy HO8(4) of the NPPF provides for a proportionate reduction in affordable housing contributions where vacant buildings are reused or redeveloped. It does not

apply to abandoned buildings or to major development on land within or released from the Green Belt.

Policy HN2 should therefore clarify how boroughs should apply London Plan housing and affordable housing policies where Vacant Building Credit applies, including the distinction between vacant and abandoned buildings. This would promote consistent implementation without duplicating national policy.

Suggested modification
Add the following supporting text:

"In applying Policy HN2, boroughs should have regard to national policy concerning the reuse and redevelopment of vacant buildings, including the treatment of affordable housing contributions and the distinction between vacant and abandoned buildings."

HN3: Delivering affordable housing

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response

Enfield Council supports the strategic objective of maximising the delivery of genuinely affordable housing and supports the continued aspiration to deliver 50 per cent affordable housing across London.

However, the Council considers that Policy HN3 is not fully Appropriate, is not currently demonstrated to be Effective, and is not fully Consistent with National Policy in relation to strategic growth locations whose housing capacity derives from Green Belt release.

Does the Plan identify the key needs appropriately?
The policy appropriately recognises:

- London's acute affordable housing need;
- the importance of maximising affordable housing delivery;
- the role of affordable housing in delivering sustainable communities; and

- the need for a clear threshold-based approach capable of supporting housing delivery.

The Council supports these objectives. However, the policy does not adequately address circumstances where strategic housing growth is expected to occur on land that is currently Green Belt but may be released through a borough Local Plan before the London Plan is adopted.

Is the draft policy supported by proportionate and appropriate evidence?
The draft Plan states that:
"For schemes on Green Belt land, regardless of location band or land profile, the Green Belt threshold affordable housing requirement applies."

The Green Belt threshold affordable housing requirement is 50 per cent, reducing to 35 per cent where significant transport infrastructure delivery is proposed.

The London Plan's spatial strategy and housing trajectory rely in part on housing growth arising from Green Belt Broad Locations for Growth, including Crews Hill and Chase Park in Enfield.

At the time of writing these locations remain within the Green Belt. However, the Enfield Local Plan is at an advanced stage of examination and proposes the release of land at Crews Hill and Chase Park. Based on the current stage of the examination process and the Inspector's post-hearing correspondence, it is possible that land at Crews Hill and Chase Park will cease to be Green Belt before the next London Plan is adopted.

The policy does not explain how such circumstances should be treated.

The Council's principal concern is that the affordable housing expectations applying to Crews Hill and Chase Park should not reduce simply because Green Belt release has already occurred through the Enfield Local Plan.

The strategic growth assumptions within the draft London Plan rely on housing delivery arising from Green Belt release. In the Council's view, the affordable housing expectations applying to those locations should continue to reflect that strategic context, regardless of whether the land remains formally designated as Green Belt at the point planning applications are determined.

The policy should therefore distinguish between:
- development that derives its capacity from Green Belt release and strategic growth assumptions; and
- development that happens to be located on land that is no longer designated Green Belt at the point of decision-making.

Without this distinction, strategic growth locations could move onto materially lower affordable housing thresholds despite relying on the same land-value uplift,

infrastructure assumptions and public-sector intervention associated with Green Belt release.

In this scenario, development at Crews Hill and Chase Park could move from a policy expectation of 50 per cent affordable housing to the standard Location Band C Fast Track threshold, despite deriving its development capacity, land-value uplift and strategic growth role from Green Belt release.

This would represent a substantial reduction from the 50 per cent threshold currently applied to Green Belt locations and would occur despite the fact that:

- the strategic housing capacity derives from Green Belt review;
- the development depends upon substantial uplift in land values associated with release;
- significant infrastructure and public intervention are expected to support delivery; and
- the London Plan continues to rely upon these locations as an important component of future housing supply.

The Council is concerned that this outcome would undermine the strategic objective of maximising affordable housing delivery.

Specific implications for Crews Hill and Chase Park
The draft London Plan is forecasting the delivery of 7,000 new homes at Crews Hill and Chase Park over a seven-year period.

However, under the current drafting of Policy HN3, development at Crews Hill and Chase Park could move from a policy expectation of 50 per cent affordable housing to the standard Location Band C Fast Track threshold once Green Belt release has occurred through the Enfield Local Plan.

In the Council's view, this would not reflect the strategic role of these locations, which derive their development capacity, land-value uplift and growth assumptions from Green Belt release and continue to rely on infrastructure investment, public intervention and long-term delivery arrangements associated with that strategic growth model.

The Council does not consider this to be an Appropriate or Effective approach.

Enfield Local Plan position
The submission version of the Enfield Local Plan, at Policy H2, requires a minimum of 50 per cent affordable housing on former Green Belt sites, including the proposed rural placemaking areas at Crews Hill and Chase Park.

The Council is therefore concerned that the draft London Plan could result in materially lower affordable housing requirements applying to the same strategic growth locations solely because Green Belt release has occurred through an adopted Local Plan before the London Plan is adopted.

Viability evidence and strategic Green Belt growth
The London Plan Viability Study July 2026 explicitly models strategic Green Belt development on the basis of a 50 per cent affordable housing requirement and concludes that delivery generally relies upon a combination of:

- grant funding;
- low-cost finance;
- public-sector-led delivery;
- transport investment;
- land assembly; and
- long-term stewardship arrangements.

The study identifies public sector-led delivery models as integral to supporting strategic Green Belt release, particularly in lower-value locations. It also concludes that Green Belt development generally cannot viably support required policy obligations and enabling infrastructure through residential development value alone and that public-sector intervention will be required.

The viability evidence therefore treats strategic Green Belt growth as a distinct delivery model supported by enhanced affordable housing provision and significant public intervention.

The Council is therefore concerned that Policy HN3 does not explain how locations whose strategic housing capacity derives from Green Belt release should be treated where that land has already been released through an adopted Local Plan prior to the adoption of the London Plan.

If strategic growth locations continue to rely upon the same assumptions regarding infrastructure delivery, public subsidy, land assembly and public-sector intervention, it is unclear why they should become subject to materially lower affordable housing thresholds solely because Green Belt release has already occurred through a borough Local Plan.

Without further clarification, there is a risk that strategic growth locations which form an important part of the London Plan's housing strategy could deliver materially lower levels of affordable housing than assumed by the viability evidence, contrary to the wider objective of maximising the delivery of genuinely affordable housing across London.

National policy and strategic Green Belt growth
The Council also notes that national policy specifically distinguishes between land currently within the Green Belt and land proposed to be released from the Green Belt.

Policy HO5 requires development plans to set a specific affordable housing requirement for major development involving housing on land which is proposed to be released from the Green Belt. Policy GB8 further requires that major housing

development on land released from the Green Belt should provide at least 50 per cent affordable housing unless this would make the development unviable.

The Council is therefore concerned that Policy HN3 does not adequately explain how strategic growth locations whose housing capacity derives from Green Belt release should be treated where that release has already occurred through an adopted borough Local Plan before the London Plan is adopted.

If strategic growth locations continue to rely upon the same assumptions regarding public intervention, transport investment, land assembly, grant funding and long-term stewardship that underpin the strategic Green Belt growth model tested through the London Plan Viability Study, it is unclear why they should become subject to materially lower affordable housing thresholds solely because Green Belt release has already occurred through a borough Local Plan.

The Council therefore considers that further clarification is required to ensure that strategic growth locations derived from Green Belt release continue to contribute appropriately towards the objective of maximising affordable housing delivery and London's strategic affordable housing ambitions.

Need for greater certainty
National policy requires affordable housing requirements to provide clarity and a high degree of certainty so that they can be reflected properly in land values, viability assessments and development proposals.

Policy HN3 currently provides insufficient clarity regarding:

- the treatment of strategic former Green Belt growth locations;
- the relationship between Green Belt release and affordable housing thresholds; and
- what constitutes "significant transport infrastructure delivery".

The policy and supporting evidence do not explain:

- what level of transport investment qualifies as significant;
- whether public transport, highway and active travel schemes are treated differently;
- how significance is assessed; or
- the extent to which affordable housing requirements may be reduced where such infrastructure is delivered.

The Council also considers that the policy should be explicit that affordable housing expectations applying to strategic growth locations should not change solely because the timing of Local Plan adoption results in a change to the formal planning designation of land before London Plan adoption.

The Council considers that this lack of clarity reduces certainty for local planning authorities, landowners, developers and communities and risks inconsistent implementation across London boroughs.

Can the Plan be delivered?
The Council does not suggest that the policy is incapable of implementation.

However, the Council is not satisfied that the policy would operate effectively in these circumstances.

The submission version of the Enfield Local Plan requires a minimum of 50 per cent affordable housing on former Green Belt sites within the proposed rural placemaking areas at Crews Hill and Chase Park.

By contrast, the draft London Plan may permit a materially lower affordable housing threshold if the same land is no longer formally designated as Green Belt by the time the London Plan is adopted.

This creates uncertainty and could result in significantly different affordable housing outcomes depending solely on the timing of Green Belt release rather than on the strategic planning objectives, viability assumptions or development economics underpinning the growth location.

What barriers may affect implementation?
The principal implementation issue is uncertainty regarding how affordable housing requirements are intended to operate at strategic growth locations released from the Green Belt through borough Local Plans.

Additional uncertainty arises because the policy does not define what constitutes: "significant transport infrastructure delivery".

It is currently unclear:

- what scale of transport intervention would qualify;
- whether transport contributions would need to be direct or indirect;
- whether strategic public transport, highway or active travel interventions would qualify;
- how significance would be assessed; or
- what level of affordable housing reduction may be justified.

Greater clarity would improve consistency of implementation across London boroughs.

Is the Plan consistent with national policy?
The Council supports the principle within national policy that significant Green Belt release should contribute strongly towards affordable housing provision.

The issue is not the principle of the affordable housing thresholds themselves, but the absence of clarity regarding their operation in circumstances where strategic growth depends upon Green Belt release through borough Local Plans.

The policy would be more closely aligned with national policy if it explained how affordable housing requirements on land that is proposed to be released from the Green Belt, or released through an adopted Local Plan, should be treated consistently.

Suggested Modifications
Enfield Council requests that the London Plan make clear that strategic growth locations whose capacity derives from Green Belt release should continue to be subject to enhanced affordable housing expectations, even where the land has subsequently been released through an adopted borough Local Plan.

Enfield Council requests that Policy HN3 and Tables 3.2 and 3.3 be amended to:

- clarify how affordable housing thresholds apply to locations that are currently Green Belt but are subsequently released through an adopted borough Local Plan;
- clarify that enhanced affordable housing expectations continue to apply to strategic growth locations whose capacity derives from Green Belt release, including land released through an adopted Local Plan;
- ensure that strategic growth locations whose capacity derives from Green Belt review are not automatically subject to materially lower affordable housing thresholds solely because Green Belt release has already occurred before London Plan adoption;
- explain how former Green Belt strategic growth locations will contribute towards the objective of maximising affordable housing delivery;
- provide a clear definition or assessment framework for "significant transport infrastructure delivery";
- explain what level and type of infrastructure investment would qualify for modified affordable housing thresholds;
- ensure that the viability assumptions underpinning strategic Green Belt growth remain aligned with the affordable housing requirements expected of those locations; and
- consider whether similar circumstances may arise elsewhere within London's Metropolitan Green Belt where release may occur through Local Plans before adoption of the next London Plan.

This should include the proposed rural placemaking areas at Crews Hill and Chase Park and any comparable strategic growth locations elsewhere in London.

Conclusion
The London Plan should therefore make clear that strategic growth locations created through Green Belt release continue to be expected to deliver enhanced affordable housing outcomes, regardless of whether the formal designation has changed through an adopted borough Local Plan.

Without this clarification, a strategic growth location expected to accommodate approximately 7,000 homes could move from a 50 per cent affordable housing

expectation to a standard Location Band C threshold simply because of the timing of Local Plan adoption and Green Belt release.

The Council does not consider this to be an Appropriate, Effective or sound approach. The policy should therefore be amended to ensure that affordable housing expectations for strategic former Green Belt growth locations remain aligned with the objective of maximising the delivery of genuinely affordable housing and contributing towards London's strategic 50 per cent affordable housing ambition.

HN4: Gypsy and Traveller accommodation

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

Yes

HN5: Managing specialist accommodation

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response

Enfield Council supports the overall objectives of Policy HN5 and recognises the need to plan positively for specialist accommodation, including:

- purpose-built student accommodation (PBSA);
- supported housing;
- specialist accommodation;
- transitional accommodation; and
- housing for older persons.

The Council acknowledges that London's population and demographic profile generate demand for a range of specialist accommodation types and agrees that boroughs should plan positively to meet identified needs.

The Council also notes that the Integrated Impact Assessment identifies positive effects arising from the provision of purpose-built student accommodation, specialist accommodation and housing for older people, including benefits relating to housing choice, health, wellbeing and equality outcomes. The Council does not dispute these benefits and supports the principle of planning positively for such accommodation.

However, Enfield Council is not currently satisfied that Policy HN5 is fully Effective because the purpose, operation, monitoring, review arrangements and consequences of the borough-level numerical targets are insufficiently explained.

Does the Plan identify the key needs appropriately?
The Council agrees that the policy identifies important strategic needs, including:

- increasing the supply of specialist and supported accommodation;
- responding to the needs of an ageing population;
- supporting people with specialist housing requirements;
- meeting student accommodation demand; and
- broadening housing choice across London.

The Council supports these objectives.

Is the draft policy supported by proportionate and appropriate evidence?
The Council recognises that the supporting evidence and Integrated Impact Assessment identify positive outcomes associated with specialist accommodation and support a positive planning approach towards these forms of development. The policy objective is therefore not disputed.

However, the Council is not satisfied that the policy sufficiently explains how the borough-level numerical targets are intended to operate in practice.

Purpose-built student accommodation
Policy HN5 allocates Enfield a target of 1,316 PBSA bedspaces.

The Council does not object in principle to the idea that all boroughs, including Enfield, should plan to accommodate students. However, the Council has not identified clear evidence of significant market demand for PBSA within Enfield and therefore questions whether this target is deliverable or effective in local circumstances.

Paragraph 3.70 of the draft London Plan acknowledges that:
"Targets contained within Table 3.6 will be kept under review, acknowledging that need for PBSA may be impacted by contextual changes in the higher education sector."

The Council agrees that demand for student accommodation can change significantly over time and notes wider uncertainty within parts of the higher education sector.

However, the draft London Plan does not explain:

- how the review process will operate;
- what evidence will trigger review;
- how revised figures will be communicated;
- whether boroughs would be expected to update Local Plans in response; or
- what consequences would arise from under-delivery.

The Council therefore questions the effectiveness of setting borough-level numerical PBSA targets where demand may change materially during the Plan period and where the operation of those targets is not clearly explained.

Effectiveness of numerical targets

The Council is unclear what practical consequence would arise if:

- a borough failed to achieve its PBSA target;
- market demand did not emerge;
- investment was directed elsewhere in London; or
- specialist accommodation was delivered in different forms from those anticipated.

In the absence of any identified policy consequence, it is unclear how these figures are intended to operate in practice or how they will influence planning decisions and housing delivery outcomes.

The Council therefore questions whether borough-level numerical targets for student accommodation, supported housing and specialist accommodation have been demonstrated to be an effective planning mechanism.

The Integrated Impact Assessment identifies positive outcomes from the delivery of these forms of accommodation. However, those positive effects do not in themselves explain how the borough-level targets will be monitored, reviewed, updated or implemented through the planning system. The Council's concern therefore relates to the effectiveness and implementation of the targets rather than their overall policy objective.

Relationship with wider housing targets

The supporting text to Policy HN1 explains that:

- student housing need is a component of general housing need and that the ten-year PBSA targets within Table 3.6 contribute towards borough housing targets.

The supporting text further explains that:

- PBSA contributes towards housing delivery on a 2.5:1 ratio, with 2.5 bedspaces counted as one dwelling;
- accommodation for older people is counted on a 1:1 ratio; and
- other forms of non-self-contained accommodation are counted on a 1.8:1 ratio.

The Council welcomes this clarification but considers that it should be more clearly signposted within Policy HN5 or its supporting text.

Greater clarity would assist understanding of:

- how PBSA contributes towards housing delivery;
- how borough housing targets are affected;
- how different forms of non-self-contained accommodation are counted; and
- how specialist accommodation targets relate to wider housing requirements.

Older persons and specialist housing

The Council acknowledges that the population aged 65 and above is projected to rise significantly in Enfield and that demand for supported, specialist and older persons accommodation is likely to increase over the plan period.

The Council therefore supports the principle of planning positively for these forms of accommodation.

However, it is not clear why borough-specific numerical targets for older persons and specialist accommodation are necessary where Local Plans are already required to assess needs and identify appropriate supply to meet those needs.

The Council is concerned that the policy does not sufficiently explain:

- the purpose and role of the numerical targets;
- how they will be monitored;
- how frequently they will be reviewed;
- the implications of under-delivery; or
- how changing demographic evidence and market circumstances will be reflected.

The Council considers that boroughs can meet identified needs for specialist and older persons accommodation through evidence-based Local Plans without necessarily requiring borough-specific numerical targets through a Spatial Development Strategy.

National policy

The Council supports the positive planning of specialist accommodation and does not suggest that Policy HN5 conflicts directly with national policy.

However, Policy HO9 of the August 2026 NPPF requires planning authorities to assess and plan for the accommodation needs of groups with specific housing requirements. It does not explicitly require a Spatial Development Strategy to establish borough-level numerical targets for PBSA, specialist accommodation or older persons accommodation.

The Council therefore considers that additional explanation is required to justify:

- the purpose of the borough-level targets;

- how they are expected to influence Local Plan preparation and decision-making;
- how they will be monitored and reviewed; and
- why they are necessary in addition to borough-level needs assessments.

Can the Plan be delivered?
The Council does not suggest that specialist accommodation cannot be delivered. However, delivery of PBSA and other specialist accommodation is dependent upon:

- market demand;
- institutional expansion and investment decisions;
- funding and operational models;
- changing demographic evidence;
- healthcare and support provision; and
- wider economic and educational conditions.

HN6: Built to rent

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

Yes

HN7: Housing size mix

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response

The current London Plan (2021) Policy H10 gives weight to robust local evidence of housing need and allows decision-makers to determine an appropriate housing mix having regard to local circumstances, whilst supporting mixed and inclusive neighbourhoods and the provision of additional family housing.

Enfield Council supports this approach.

The draft London Plan would require borough housing size-mix policies for market housing to be based on the London Strategic Housing Market Assessment.

Enfield Council does not consider it justified for the London Plan to require borough housing size-mix policies for market housing to be based solely on the London Strategic Housing Market Assessment where a borough has prepared a robust and up-to-date Local Housing Needs Assessment that has informed its Local Plan evidence base.

The submission version of the Enfield Local Plan is supported by a borough-specific Local Housing Needs Assessment (LHNA), which has informed Policy H3 on Housing Mix and Type and has been subject to examination through the Local Plan process.

Policy H3 requires:

- at least 20% of units to be two-bedroom homes;
- at least 30% of units to meet the London Plan definition of family housing; and
- for affordable housing on publicly owned sites and former Green Belt locations, at least 40% family housing.

Enfield's Local Housing Needs Assessment

Enfield's Local Housing Needs Assessment presents a materially different picture of housing need from the London-wide Strategic Housing Market Assessment.

The LHNA identifies a strong need for family-sized accommodation within Enfield and indicates that much of the borough's future housing need is for larger homes.

In particular:

- within the affordable sector, the greatest need is for 2 and 3-bedroom homes;
- within the market sector, the greatest need is for 3 and 4-bedroom homes; and
- overall, the evidence demonstrates a significantly greater requirement for family-sized housing than is suggested by the London-wide assessment.

This differs materially from the London Strategic Housing Market Assessment, which concludes that 1 and 2-bedroom homes account for the majority of identified need across London.

Enfield Council does not consider that the London-wide assessment accurately reflects the borough's own evidence base.

The Council is therefore concerned that requiring local housing size-mix policies for market housing to be based on the London Strategic Housing Market Assessment could constrain the ability of boroughs to respond to locally evidenced housing needs.

In Enfield's case, such an approach risks under-providing family housing and would be inconsistent with the evidence underpinning the emerging Enfield Local Plan, particularly in relation to strategic growth locations such as Crews Hill and Chase

Park where larger family homes are expected to form an important component of the housing mix.

Modification sought
Enfield Council requests that Policy HN7 be amended to allow boroughs to prepare housing size-mix policies using robust local evidence, including borough-level Local Housing Needs Assessments, whilst having regard to the London Strategic Housing Market Assessment.

Boroughs should not be required to base local housing size-mix policies solely on the London-wide assessment where more detailed local evidence exists.

The Council is also concerned that there is an inconsistency between treating London as a single housing market area for the purposes of housing need whilst simultaneously applying differentiated locational approaches elsewhere in the Plan, including through the Threshold Approach.

Conclusion
Enfield Council considers Policy HN7 to be a backward step from existing London Plan Policy H10 because it reduces the role of robust local evidence in determining housing mix.

The policy is not sufficiently justified because it does not explain why borough-level Local Housing Needs Assessments should be given less weight than under the current London Plan.

Without amendment, the policy risks constraining the delivery of family-sized housing in locations where local evidence demonstrates a clear need, including Enfield's strategic growth locations.

Enfield Council therefore requests that boroughs be permitted to continue preparing housing size-mix policies based on robust local evidence, whilst having regard to the London-wide Strategic Housing Market Assessment.

HN8: Housing design

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response

Draft London Plan policy HN8 on housing design states that private internal and outside spaces for individual dwellings should:

(1) Meet the Nationally Described Space Standard (NDSS)
(2) Provide a minimum floor-to-ceiling height of at least 2.4m for at least 75 per cent of the gross internal (GIA) of each dwelling.

Enfield Council note that the NDSS states that the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area of a new dwelling.

The policy asks an applicant in clause 1, to meet NDSS, but then in clause 2 increases a minimum standard as set out within the NDSS but only this ceiling height standard. Therefore, the draft London Plan is attempting to set a standard that is higher than the NDSS by 10cm in relation to ceiling heights.

Some justification for this is provided in supporting text where it is stated that, 'The requirements for minimum internal and private outside spaces and higher ceilings than the NDSS are particularly important in London given its dense urban environment, the predominant and unique flatted nature and higher density of new build housing provision. The minimum area and dimensions for the private outside space in the new policy are to ensure the space provided is functional and accessible. The minimum floor-to-ceiling height of 2.4m in new housing helps ensure they provide adequate quality, especially in terms of daylight penetration, ventilation and cooling, and sense of space. This context also means it is particularly important that shared indoor and outside spaces are well designed.'

However, the current London Plan (2021) at policy D6 paragraph 8 states that, 'The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.'

If the requirements for minimum internal and private outside spaces and higher ceilings than the NDSS are particularly important in London, then Enfield Council do not understand why this ceiling height standard has been lowered by 10cm in the draft London Plan. At the same time, the draft London Plan maintains that it is critically important that ceiling heights in London are maintained at 10cm higher than anywhere else in the country to which the Nationally Described Space Standards apply. Does the dense urban environment in London really mean that new houses should have marginally higher ceilings than those in Manchester, Birmingham, Leeds or Liverpool, for example? Enfield Council are not convinced that the justification provided in the supporting text, regarding minimum ceiling heights of 2.4m, is persuasive.

It would make more sense if the draft London Plan were proposing to maintain rather than lower existing ceiling height standards. Indeed, officers in Enfield would support minimum ceiling heights at 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling. The fiddling at 10cm above NDSS has not been well justified. The way the policy is written is also confusing because at clause 1 it asks applicants to meet NDSS and at clause 2 it asks applicants to exceed the standards set out in the NDSS. This policy should be revisited and revised for soundness and for consistency with national policy including policy 'PM13: Setting standards' in the NPPF.

In Enfield Council's view it is not exactly clear as to whether policy HN8 applies to all residential development including new builds, conversions and change of use including change of use of dwellings into houses of multiple occupation (HMOs). Please could the GLA clarify in this policy that the housing design standards set out in policy HN8 do apply to applications for HMOs, whether these are new build HMOs or conversions of existing housing stock into HMOs. In Enfield Council's view policy HN8 should certainly apply to all residential development including new builds, conversions and change of use including change of use of dwellings into HMOs, as occupants of all dwellings in London should be entitled to equally good minimum residential living standards now and into the future.

Enfield Council does not understand why kitchens and/or dining rooms should not have openable windows where they form part of an open-plan room that receives natural light, and this needs further explanation and justification.

HN9: Accessible housing

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response

Enfield Council generally welcomes much of the content of this policy. However, some modification will be required for soundness.

For example, policy HN9 applies to various types and sizes of residential development.

However, it seems that this policy should apply to all major development (10+ housing units), rather than to smaller scales of residential development. For example, if 10% wheelchair accessible units are to be provided it suggests that a minimum of ten units are needed in a development to provide one wheelchair accessible unit. It is suggested that an amendment is made to the draft policy for effectiveness and to clarify the types of planning applications to which it applies.

Furthermore, or alternatively, the draft London Plan should clarify whether this policy applies to conversions and change of use including change of use of C3 dwellings into houses of multiple occupation (HMOs) (C4 / Sui Generis).

It should be noted that policy 'PM13: Setting standards' in the NPPF states that accessibility standards should be set in accordance with policy HO5 of the NPPF.

HN10: Burial space

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response

Enfield Council supports the overall objective of Policy HN10 and agrees that burial provision is an increasingly important strategic planning issue for London. The Council recognises the evidence demonstrating growing pressure on burial capacity, the importance of planning proactively for future provision and the need to take account of faith-specific burial requirements.

The Audit of London Burial Provision and Enfield's Burial Needs Assessment both demonstrate a clear strategic and local need for additional burial provision.

However, the Council considers that the policy requires modification to provide greater recognition of borough-level evidence, local circumstances and the role of Local Plans in identifying and delivering future burial provision. Subject to these modifications, Enfield supports the overall direction of the policy.

Does the Plan identify the key needs of the area appropriately?
The Council agrees that the policy identifies a number of important strategic issues appropriately, including:

- growing demand for burial space across London;

- the uneven distribution of burial capacity;
- the need for long-term planning;
- faith-specific burial requirements;
- the importance of cross-boundary collaboration; and
- the need to consider grave reuse, intensification and cemetery expansion before seeking new sites.

The Council particularly welcomes recognition that some communities, including parts of the Muslim and Jewish communities, require burial rather than cremation and may therefore have specific land and operational requirements.

However, local circumstances vary significantly across London. Enfield's own Burial Needs Assessment identifies capacity issues, faith-specific needs, extension opportunities and long-term land requirements in considerably greater detail than the London-wide audit. Borough-level evidence should therefore have a stronger role in informing implementation of the policy.

Are there additional needs that should be addressed?
The Council considers that greater emphasis should be given to:

- faith-specific burial requirements, particularly Muslim burial provision;
- long-term strategic land requirements;
- delivery mechanisms and site identification;
- natural and woodland burial provision;
- the role and practical limitations of grave reuse;
- the relationship between burial provision and Green Belt policy;
- land acquisition, funding and site preparation;
- long-term management and stewardship; and
- the use of borough-level burial-needs assessments in planning future provision.

Enfield's Burial Needs Assessment identifies a substantial future shortfall in Muslim burial provision and concludes that additional land allocations and site extensions will be necessary to meet future need. The study also identifies emerging demand for natural and woodland burial provision.

Is the draft policy supported by proportionate and appropriate evidence?
The Council considers that the policy is generally supported by proportionate evidence.

The London-wide audit identifies a strategic need for additional burial provision and demonstrates that many boroughs face future capacity challenges. It also provides useful strategic context regarding the effects of population growth and demographic change on future burial demand.

However, the London-wide audit is intended to provide a strategic overview and is based on borough returns, assumptions and proxy data. It does not provide the same level of detail available through locally prepared burial-needs assessments.

Enfield's own burial study identifies:

- a requirement for approximately 4.8 hectares of additional burial land by 2036;
- approximately 7.7 hectares by 2041;
- a deficit of approximately 9,660 burial plots by 2036 and 15,152 by 2041;
- significant pressure on Muslim burial provision; and
- opportunities for cemetery expansion and future delivery.

The policy should therefore expressly recognise that up-to-date borough-level burial-needs assessments may supplement, refine and, where supported by more detailed evidence, update the findings of the London-wide audit.

This would align with the August 2026 NPPF requirement for plans to be informed by relevant, proportionate, reliable and sufficiently up-to-date evidence.

Have reasonable alternatives been considered?
The Council notes that Policy HN10 promotes a sequential approach that prioritises:

1. grave reuse and intensification;
2. expansion of existing burial sites;
3. new burial provision within urban areas; and
4. Green Belt or Grey Belt provision where necessary.

The Council generally supports this approach. It reflects the need to make effective use of land while recognising the practical constraints on burial provision within a highly urbanised city.

The London-wide audit and Enfield's Burial Needs Assessment consider a range of approaches to meeting future need, including grave reuse, cemetery extensions, new cemetery provision and cross-boundary solutions.

However, the sequential approach should not be applied mechanistically. The suitability and capacity of each option will depend on factors including:

- faith-specific burial practices;
- ground and groundwater conditions;
- operational requirements;
- environmental constraints;
- accessibility;
- land availability; and
- the timing of need.

The policy should therefore allow borough-level evidence to determine the appropriate balance between reuse, intensification, extension and new provision.

Are there alternatives that should have been assessed?
The Council does not identify a fundamentally different strategic approach that should have been assessed.

However, the policy should provide sufficient flexibility for boroughs to respond to local evidence regarding:

- faith-specific burial requirements;
- the balance between new provision, extensions and grave reuse;
- natural and woodland burial options;
- strategic cross-boundary arrangements;
- public, private and partnership delivery models; and
- the identification of suitable sites.

Borough-level assessments should remain central to these decisions, and local evidence should be capable of refining or updating strategic London-wide assumptions where appropriate.

Can the Plan be delivered?

The Council considers that the overall policy direction is capable of delivery. Enfield's Burial Needs Assessment identifies a range of mechanisms that could contribute towards meeting future need, including:

- extensions to existing cemeteries;
- new strategic cemetery provision;
- continuation of grave-reuse programmes;
- collaboration with private providers;
- cross-boundary arrangements; and
- long-term site allocations.

However, successful delivery will depend upon more than identifying a quantitative need. It will require:

- suitable, available and deliverable land;
- land acquisition and assembly;
- an appropriate delivery body;
- identified funding and implementation arrangements;
- access and supporting infrastructure;
- drainage and groundwater protection;
- ecological and landscape mitigation;
- faith-appropriate design and management arrangements; and
- long-term maintenance and stewardship.

Where provision relies on new Green Belt or Grey Belt sites, the generally open character of burial uses does not remove the need to establish a realistic delivery and funding route.

Borough-level evidence should therefore consider the full costs and practical implications of bringing sites forward, rather than treating the identification of need as sufficient evidence of deliverability.

What barriers may affect implementation?

The principal barriers include:

- limited land availability;

- competition with other land uses;
- land acquisition and assembly;
- Green Belt and Metropolitan Open Land considerations;
- environmental, drainage and groundwater-protection requirements;
- flood risk, ecology and access constraints;
- faith-specific operational requirements;
- funding and delivery arrangements;
- securing an appropriate delivery body;
- long-term maintenance and stewardship;
- cross-boundary coordination; and
- delays in identifying, allocating and bringing forward new sites.

Enfield's evidence demonstrates that identifying a quantitative need does not, by itself, secure a suitable or deliverable site. The policy should therefore encourage burial authorities and planning authorities to align needs evidence, Local Plan allocations, capital planning and long-term cemetery-management arrangements.

Is the Plan consistent with national policy?
The Council considers that the overall policy direction is broadly consistent with the August 2026 NPPF.

The NPPF recognises cemeteries and burial grounds as community facilities and supports positive planning for community-infrastructure needs.

It also identifies cemeteries and burial grounds as forms of development that may be appropriate outside settlements and confirms that burial grounds and associated facilities may be acceptable within the Green Belt where openness is maintained and Green Belt purposes are not harmed.

The Council therefore supports the policy's recognition that Green Belt and, where relevant, Grey Belt land may contribute towards meeting future burial requirements where other reasonable options are insufficient.

However, the acceptability of burial provision in principle does not determine the suitability or deliverability of an individual site. These matters should remain subject to proportionate borough-level evidence, environmental assessment and Local Plan or development-management consideration.

To ensure consistency with the August 2026 NPPF, HN10 should make clear that the London-wide audit provides strategic context, while up-to-date local burial-needs assessments should inform:

- local need;
- capacity;
- site options;
- environmental and operational constraints;
- delivery mechanisms;
- future land requirements; and

- site allocations.

Modifications sought
To make Policy HN10 sound, Enfield Council requests that the policy and supporting text be modified to:

1. Confirm that up-to-date borough-level burial-needs assessments may supplement, refine and, where supported by more detailed evidence, update the findings of the London-wide audit.
2. Strengthen recognition of faith-specific burial requirements, particularly where burial rather than cremation is required.
3. Clarify the relationship between HN10 and Green Belt policy, recognising that burial grounds are a distinct, generally open land use and should not automatically be treated in the same manner as housing-led or industrial Green Belt development.
4. Confirm that the acceptability of burial provision in the Green Belt in principle does not remove the need for site-specific assessment of suitability, environmental effects, access and deliverability.
5. Encourage positive planning for natural and woodland burial provision where local evidence demonstrates demand.
6. Reinforce the importance of long-term strategic site identification through Local Plans where future capacity shortfalls are evidenced.
7. Require burial-provision strategies to consider land acquisition, funding, site preparation, delivery responsibilities and long-term management and stewardship.
8. Confirm that Local Plans remain the primary mechanism for identifying and allocating new strategic burial sites, while allowing appropriate cross-boundary agreements and delivery arrangements.

Conclusion
Enfield Council supports the overall objective of Policy HN10 and recognises that burial provision is an increasingly important strategic planning issue. Both the London-wide audit and the Council's own burial-needs assessment demonstrate growing pressure on capacity and the importance of proactive planning.

However, the policy should give greater recognition to borough-level evidence and local delivery circumstances. Enfield's assessment provides a more detailed understanding of local capacity, faith-specific requirements, future land needs and potential delivery options than is available through the strategic London-wide audit.

The policy should also recognise that evidence of need does not, by itself, demonstrate delivery. New burial provision may depend on suitable land, acquisition, funding, environmental mitigation, access and long-term stewardship.

Subject to the modifications sought, including clearer recognition of local evidence and delivery requirements, Enfield Council supports the overall direction of Policy HN10.

Chapter 4: Growing London's economy

GLE1: Sufficient and appropriate employment space

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response

Part A of the policy requires plan making authorities to 'set out policies in local plans to meet the diverse land and floorspace requirements for all economic uses'. We welcome this support for economic diversity.

However, Table 15-3 in the London Economic Uses - Supply and Demand Study indicates net demand for office of 55,400 sqm in Enfield over the period 2024-2050. Whilst this is a lengthy period likely to span several market cycles, we are conscious that there is a notable lack of interest in office development, evidenced by several Enfield 'Call for Sites' exercises over a number of years. This is echoed by the GLA's evidence at Figure 2.2c of the London Plan Town Centres Research (roles and functions) report which shows a significant decline in office floorspace in all of London's town centres (except for the CAZ and Isle of Dogs).

We therefore question whether such a high office floorspace indicative need figure is robust and supported by the evidence in the round.

GLE2: Supply of industrial land

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response

Whilst we welcome the requirement for local plans to meet industrial needs, we disagree that the delivery of identified needs should be dependent on the following requirement (GLE2 part B): '… They should also collaborate and pool their respective capacities and plan to re-provide capacity in advance of any release elsewhere within their PMA.'

When considered alongside PV5 Industrial land supporting housing growth, this could lead to a requirement for Enfield to provide for the needs of other boroughs, including through the release of Green Belt land.

Setting aside these negative consequences, this policy approach is not likely to be effective in its operation, as others in the same PMA are at different points in the plan making cycle. The first borough going forward at examination would therefore face challenges in terms of evidencing meeting employment needs.

Table 10 in the GLA 'London Plan Industrial Evidence Base Paper' (Appendix A, p. 14) states that Enfield's demand for storage and distribution for 2024-2050 is 63,000 sqm. In absolute terms, this demand is equivalent to 2-3 large site allocations. In contrast, the key diagrams show that Enfield will accommodate a Green Belt Industrial BLG, and a 'Green Belt future candidate industrial', which signals an expectation that Enfield will be expected to accommodate wider demands arising from other local authorities.

We also have concerns that this approach does not effectively prioritise brownfield development over greenfield. GLE2 Part E requires plan making authorities to 'progress strategic-scale release of Green Belt land to help meet their strategic needs.' This approach fails to make effective and efficient use of previously developed land, contrary to NPPF Policy L1.

GLE3: Data centres

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

Yes

In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

LBE response

We welcome the introduction of a data centre policy, which sets out clearly the criteria needed to identify locations and assess development proposals to ensure that impacts can be mitigated and benefits can be optimised.

Prior to the adoption of the future London Plan, we would recommend that best practice examples/ guidance are disseminated to plan making/ decision making authorities to assist with optimising benefits and mitigating impacts for local communities and the environment.

GLE4: Night-time economy

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Overall, we welcome the balanced approach to managing the nighttime economy as set out in GLE4. However, we have concerns with the support for 24-hour operation of SIL and LSIS set out in criterion A3. The nature of LSIS means that industry and other uses are often densley mixed, so this would raise 'agent of change' issues for new industrial uses in LSIS, risking noise and disturbance issues for non-industrial neighbours. Whilst not a strict soundness issue, we would welcome some reflection on this point in order to avoid unintended consequences for a broad range of land uses and activities.

GLE5: Culture and creative industries

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

Yes

GLE6: Visitor infrastructure

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

Yes

GLE7: Affordable workspace

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

Yes

GLE8: Access to employment and skills

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

Yes

GLE9: Aviation

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council recognises the important contribution aviation makes to London's economic success, international connectivity and employment. The Council supports the principle of making best use of existing airport capacity where environmental, health, transport and community impacts are properly assessed and addressed.

However, the Council considers that Policy GLE9 is only partly Effective, particularly in relation to airport-related growth, sustainable surface access and the emerging Advanced Air Mobility sector.

The policy appropriately requires aviation proposals to assess and address environmental and health impacts, share benefits with affected communities, contribute towards sustainable surface access and engage with stakeholders.

However, further clarity is required regarding:

- how cumulative aviation impacts across London's airport system will be assessed;
- the interaction between airport growth, background transport growth and the capacity of strategic public-transport and highway networks;
- the treatment of air quality, noise, greenhouse-gas emissions and health impacts;
- how benefits and adverse effects will be identified and shared between host and affected communities;
- the role of London boroughs affected by aviation activity but located outside airport boundaries; and
- monitoring and review where anticipated environmental or transport mitigation is not delivered.

The policy also provides an initial framework for Advanced Air Mobility, including drones and electric vertical take-off and landing vehicles. The Council recognises that this is an emerging sector, but considers that relying principally on case-by-case assessment risks inconsistent decision-making before a sufficiently developed strategic framework is available. The Integrated Impact Assessment itself recognises the need to consider the opportunity cost of land and the cumulative spatial effects of Advanced Air Mobility sites.

Further guidance is required covering:

- appropriate and inappropriate locations;
- cumulative impacts arising from multiple sites;
- noise, air quality, safety and amenity;
- effects on housing, employment and green infrastructure;
- surface-access requirements;
- community engagement;
- monitoring; and
- the relationship with other aviation, transport and safety regulators.

Modifications sought

Enfield Council requests that Policy GLE9 and its supporting text be amended to:

- clarify how cumulative environmental, health and transport impacts across airports and affected boroughs should be assessed;
- explain how sustainable surface-access requirements will be linked to airport or operational growth;
- establish monitoring and review arrangements where mitigation or transport investment is not delivered;
- clarify the involvement of boroughs affected by aviation activity but outside airport boundaries; and
- commit to detailed London-wide guidance for Advanced Air Mobility before significant development of the sector occurs.

Subject to these modifications, the Council supports the policy's overall objective.

GLE10: Safeguarded wharves

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council supports the protection of sufficient wharf capacity to meet London's waterborne freight needs. Moving freight by water can reduce pressure on the highway network, support London's economy and reduce emissions associated with transporting bulk materials by road. The draft Plan identifies a need for more than 11 million tonnes of waterborne freight-handling capacity up to 2050, while its evidence indicates a potential shortfall in capacity.

However, the Council considers that Policy GLE10 is not fully Justified or Effective because further clarity is required concerning wharf consolidation, compensatory capacity, nearby development and the relationship with the Brownfield First Opportunity Area strategy.

The policy requires Local Plans to protect wharf operations, manage nearby development so that wharves can operate effectively 24 hours a day, and explore consolidation or compensatory capacity where this is proposed to optimise brownfield development.

The Council supports protection of operational capacity but considers that the policy should distinguish more clearly between:

- nominal site or floorspace replacement;
- equivalent freight-handling capacity;
- berth depth and vessel access;
- operational functionality;
- onward freight movement;
- environmental effects; and
- capacity that is genuinely available and deliverable.

Compensatory capacity should be secured and demonstrated to be operationally equivalent before an existing wharf is released or consolidated. The supporting text indicates that equivalence should consider functionality for heavy freight, volume, river sector and property-market area, but these requirements should be expressed more clearly in the policy itself.

The policy should also give clearer guidance on the relationship between 24-hour wharf operations and nearby housing-led or mixed-use development. The Integrated Impact Assessment identifies both the benefits of waterborne freight and potential adverse noise and air-quality effects associated with continuous wharf activity.

Where new development is planned close to safeguarded wharves, the policy should require:

- effective application of the agent-of-change principle;
- appropriate separation, layout and design;
- assessment of noise, air quality, lighting and freight movements;
- safeguarding of access and servicing arrangements; and
- measures ensuring that new development does not prejudice continued wharf operation.

Modifications sought

Enfield Council requests that Policy GLE10 and its supporting text be amended to:

- clarify the evidence required to demonstrate a deficiency or surplus in wharf capacity;
- require compensatory capacity to be operationally equivalent, deliverable and secured before existing capacity is released;
- move the relevant tests concerning freight type, volume, river sector and property-market area into the policy itself;
- clarify the relationship between wharf consolidation and Brownfield First Opportunity Areas;
- strengthen agent-of-change requirements for development near wharves;
- require assessment of the cumulative transport, noise, air-quality and environmental implications of 24-hour operation; and
- identify how wharf capacity, consolidation and compensatory provision will be monitored over the Plan period.

Subject to these changes, the Council supports safeguarding a viable and effective network of working wharves.

GLE11: Circular economy

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield welcomes the reframing of circular economy policies within the waste and resource efficiency context, as this reflects their role in reducing waste, supporting reuse and keeping materials at their highest value.

However, this reframing should not weaken the link with whole-life-cycle carbon, retrofit-first development and energy policy. To ensure the policy is sound and effective, the Plan should retain clear cross-references between these areas and

explain how Circular Economy Statements, Whole-Life-Cycle Carbon Assessments and pre-redevelopment audits should work together.

GLE12: Waste

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council supports the objective of moving towards net waste self-sufficiency, reducing waste generation and improving waste sustainability across London. The Council also supports the continued protection of waste-management capacity and effective partnership working between planning authorities, waste authorities and Mayoral Development Corporations.

However, the Council considers that Policy GLE12 is only partly Effective because the draft wording weakens the expectation for Mayoral Development Corporations (MDCs) to assist boroughs in meeting identified waste-management needs.

The London Plan 2021 states:
"Mayoral Development Corporations (MDCs) must cooperate with host boroughs to meet identified waste needs."

The draft London Plan 2026 replaces this with:
"MDCs should cooperate with host boroughs to support them in meeting identified waste needs."

The Council considers that this change materially weakens the policy.

Waste planning is a strategic, cross-boundary issue that depends upon long-term safeguarding of waste-management capacity, infrastructure planning and effective cooperation between planning authorities, waste authorities and delivery bodies. A requirement to meet identified waste needs provides a clearer and more effective framework than a requirement simply to support boroughs in meeting those needs.

This is particularly important for Enfield as a constituent borough of the North London Waste Authority area, where waste planning and waste infrastructure are delivered through partnership working across borough boundaries. Effective waste planning relies on certainty regarding future capacity, safeguarding of facilities and coordinated decision-making across multiple organisations.

The revised wording creates uncertainty regarding:

- the responsibilities of MDCs in planning for waste infrastructure;
- how cooperation will operate in practice;
- whether MDCs are expected to accommodate identified waste needs within their areas; and
- how strategic waste-management capacity will be protected where competing development pressures arise.

Suggested Modification
Enfield Council requests that paragraph 4.104 be amended to restore the stronger requirement contained within the London Plan 2021:

"Mayoral Development Corporations (MDCs) must cooperate with host boroughs to meet identified waste needs."

Alternatively, the supporting text should make clear that MDCs are expected to play an active role in accommodating, safeguarding and delivering identified waste-management capacity, working alongside boroughs and waste authorities such as the North London Waste Authority.

Conclusion
Enfield Council supports the strategic objective of improving waste sustainability and moving towards net waste self-sufficiency. However, the proposed change from a requirement for MDCs to meet identified waste needs to a requirement merely to support boroughs in meeting them weakens the effectiveness of the policy, reduces certainty regarding delivery responsibilities and risks undermining strategic waste planning and cross-boundary partnership working. The Council therefore seeks the modification above.

GLE13: Aggregates and mineral resources

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council supports the overall objective of Policy GLE13 and recognises the important contribution that aggregates and mineral resources make to housing delivery, infrastructure provision and economic growth across London.

The Council supports:

- the safeguarding of aggregate resources and associated infrastructure;

- the continued use of railheads, wharves and strategic freight infrastructure;
- the efficient use of recycled and secondary aggregates; and
- the role of mineral resources in supporting London's housing and infrastructure needs.

However, the Council considers that the policy is only partly Effective because it provides limited guidance on how aggregate safeguarding should be reconciled with other strategic priorities, including housing delivery, industrial intensification, logistics activity and major regeneration programmes.

In outer London boroughs such as Enfield, strategic land can be subject to multiple competing demands, including:

- housing and regeneration;
- industrial and logistics activity;
- utilities and infrastructure;
- waste management; and
- freight and aggregate infrastructure.

The policy would benefit from additional supporting text explaining how these competing strategic objectives should be balanced where safeguarding requirements interact with wider growth and regeneration priorities.

The Council also considers that the policy should place greater emphasis on the role of recycled and secondary aggregates in supporting the circular economy, reducing pressure on primary resources and contributing to London's wider sustainability objectives.

Suggested modification

Enfield Council requests that supporting text to Policy GLE13 be amended to:

- provide clearer guidance on balancing aggregate safeguarding with other strategic land-use priorities;
- explain how safeguarding should be considered alongside regeneration, industrial and housing objectives; and
- strengthen references to recycled and secondary aggregates as part of a circular economy approach.

Conclusion

Enfield Council supports the overall direction of Policy GLE13. However, additional guidance is required to improve implementation and ensure the policy operates effectively alongside other strategic growth, regeneration and infrastructure objectives across London.

Chapter 5: Creating a greener, resilient and healthy (GHR) city

GHR1: Energy efficiency

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council strongly supports the objective of Policy GHR1 and welcomes its focus on reducing regulated and unregulated energy demand. The use of Energy Use Intensity and Space Heating Demand provides a clearer focus on actual building performance and should help reduce the gap between predicted and operational energy use.

However, the Council considers that the policy is only partly Effective because it does not provide sufficient clarity on how the requirements will be implemented, reviewed and strengthened over the Plan period.

The policy and supporting text should:

- establish a clear trajectory for progressively tightening energy-performance targets during the Plan period;
- explain how the requirements apply proportionately to smaller, non-standard and mixed-use developments;
- clarify the relationship between energy efficiency, ventilation, overheating and future climate resilience;
- explain how operational performance will be monitored and verified following occupation; and
- identify how the policy will respond where evidence shows a continuing performance gap.

Modification sought
Amend the policy or supporting text to establish implementation, monitoring and review arrangements, including a clear pathway for strengthening energy-performance targets during the Plan period.

Subject to these modifications, the Council supports the policy's overall direction

GHR2: Low-cost low-carbon heat

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council supports the objective of delivering affordable, low-carbon heat and recognises the important role of heat networks, Local Area Energy Planning and heat-network zoning in supporting London's transition away from fossil-fuel heating.

However, the Council considers that Policy GHR2 is not currently demonstrated to be fully Effective because important aspects of implementation, decision-making and funding remain unclear.

Further clarity is required on:

- the relationship between Local Area Energy Planning, heat-network zoning and planning decisions;
- the evidence applicants must provide where connection to an existing or planned heat network is not proposed;
- the circumstances in which connection may not be technically or financially feasible;
- the respective roles of planning authorities, heat-network operators and zone-coordinating bodies;
- how heat-network delivery will be phased alongside development; and
- how low-carbon heat infrastructure will be funded.

The removal of carbon-offsetting arrangements is also a significant change. While the Council supports stronger on-site performance, offsetting has provided funding for borough-led decarbonisation, retrofit and energy-efficiency measures. The Plan should identify an alternative funding mechanism if those contributions are removed.

The Council is also concerned that the removal of a clear presumption against new gas boilers may weaken the transition away from fossil-fuel heating.

Modifications sought

Amend the policy and supporting text to:

- clarify how heat-network zoning and Local Area Energy Planning should influence planning decisions;
- define the evidence required where connection is not proposed;
- identify delivery, funding and coordination responsibilities;
- provide an alternative funding mechanism for borough-level decarbonisation activity if offsetting is removed; and

- retain a clear presumption against new fossil-fuel heating systems, except in genuinely exceptional and justified circumstances.

These changes are required to provide a clear and deliverable framework for low-carbon heat.

GHR3: Whole life-cycle

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council strongly supports Policy GHR3 and its emphasis on reducing upfront embodied carbon and whole-life-cycle carbon. The focus on pre-redevelopment audits, retention and reuse of existing structures, and an evidence-based retrofit-first approach is particularly welcome.

However, the Council considers that the policy is only partly Effective because:

- its application is limited principally to referable development;
- the evidence required to justify demolition is insufficiently defined;
- the relationship between pre-redevelopment audits and whole-life-cycle carbon assessments requires clarification; and
- there is no clear trajectory for strengthening embodied-carbon expectations over the Plan period.

The carbon consequences of demolition and redevelopment are also relevant to major schemes below the Mayoral referral threshold. A proportionate approach should therefore apply to all major development, with the level of assessment reflecting the scale, typology and complexity of the proposal.

Where demolition is proposed, applicants should demonstrate that meaningful retention, adaptation and refurbishment options have been properly assessed. The policy should require consideration of the overall planning and carbon outcome, rather than treating redevelopment as the default option.

Modifications sought

Amend the policy and supporting text to:

- extend proportionate whole-life-cycle carbon assessment to all major development;
- require robust evidence that retention, adaptation and refurbishment have been properly assessed before demolition is accepted;

- clarify how pre-redevelopment audits and whole-life-cycle carbon assessments should work together;
- introduce proportionate reporting requirements by scale and development type; and
- establish a trajectory for progressively tightening embodied-carbon expectations.

These changes would make the policy more effective while retaining its strongly supported strategic objective.

GHR4: Heat risk

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council supports Policy GHR4 and welcomes its approach to reducing heat risk at both building and neighbourhood scale. The policy appropriately links overheating with public health, energy demand, the urban heat-island effect, building design and green and blue infrastructure.

The Council particularly supports:

- prioritising passive measures before active cooling;
- appropriate building layout and orientation;
- control of solar gain and glazing;
- external shading and shutters;
- natural and mixed-mode ventilation;
- high-albedo materials;
- green and blue infrastructure;
- appropriately designed ceiling fans; and
- dynamic overheating modelling using suitable future weather files.

However, the Council considers that the policy is only partly Effective because it does not establish sufficiently clear expectations for the green and blue infrastructure required to address heat risk at neighbourhood and development scale.

The relationship between GHR4 and Policies GHR5, GHR7 and GHR8 also requires strengthening. Heat mitigation should be integrated with drainage, urban greening, tree canopy, accessible green space and public-realm design rather than assessed as a separate technical issue.

Modifications sought
Amend the policy or supporting text to:

- provide clearer and proportionate expectations for green and blue infrastructure as part of heat-risk mitigation;
- strengthen cross-references to GHR5, GHR7 and GHR8;
- require proposals to demonstrate how heat-risk measures will function at building, site and neighbourhood scales; and
- clarify how passive measures should be prioritised and secured through design and planning conditions.

These changes would provide greater certainty and improve implementation of a policy objective the Council strongly supports.

GHR5: Flood risk and drainage

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council supports the objective of reducing flood risk and improving sustainable drainage. However, the Council considers that Policy GHR5 is not currently demonstrated to be fully Effective and requires modification to provide a comprehensive and consistently applicable framework.

Flood risk from all sources
The policy focuses heavily on surface-water flooding. It should address flood risk from all relevant sources, including:

- fluvial flooding;
- groundwater;
- surface water;
- sewers;
- reservoirs; and
- interactions between different sources of flooding.

References to identifying flow paths and priority areas should not be limited to surface-water risks where other sources may materially affect development.

Safety and vulnerable development
The policy should establish clear expectations regarding:

- finished-floor levels;
- safe access and escape;

- flood-resistant and flood-resilient construction;
- evacuation planning;
- flood compensation; and
- more vulnerable development and changes of use, including HMOs.

The Council also considers that the policy should address groundwater flood-risk assessments and provide a clear approach to basement development.

Source control and runoff
The policy should align clearly with national drainage standards by requiring interception or source-control measures for the first 5 mm of rainfall.

The current wording relating to "some surface-water capture" is insufficiently precise and could lead to inconsistent implementation.

For referable development, the Council considers that greenfield runoff rates should be achieved unless robust evidence demonstrates that this is not feasible. Other development should achieve rates as close to greenfield runoff as reasonably possible.

Off-site provision and drainage hierarchy
Off-site contributions may be appropriate where a coordinated neighbourhood solution exists or on-site opportunities are genuinely constrained. However, off-site provision should not replace reasonable on-site source control, water-quality measures and attenuation.

The drainage hierarchy should also:
- prioritise source-control and interception measures;
- distinguish clearly between above-ground and below-ground attenuation;
- ensure discharge to watercourses remains controlled; and
- prevent the hierarchy from being interpreted as allowing uncontrolled or inadequately mitigated discharge.

Modifications sought
Amend GHR5 and its supporting text to address flood risk from all sources, establish safety requirements, clarify groundwater and basement-development expectations, align source-control requirements with national standards, strengthen runoff expectations and revise the drainage hierarchy.

These modifications are needed to ensure the policy is technically clear, effective and capable of consistent implementation.

GHR6: Trees, biodiversity and geodiversity

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council supports the principal objectives of Policy GHR6, including the protection of veteran trees, increased canopy cover, enhancement of Sites of Importance for Nature Conservation and delivery of biodiversity gains.

However, the Council considers that the policy is only partly Effective because it does not adequately recognise:

- the cumulative ecological contribution of undesignated green and blue spaces;
- highway landscaping and public-realm planting;
- the role of smaller spaces in habitat connectivity;
- the consequences of losing undesignated green space; and
- the prevention and management of invasive non-native species.

Individually modest green spaces, highway verges and landscaped public areas can collectively make an important contribution to biodiversity, drainage, cooling, connectivity and residents' access to nature. The policy should therefore avoid concentrating solely on formally designated sites.

The Council strongly supports increased tree planting and canopy cover. However, physical constraints may include utilities, sight lines, access requirements and proximity to buildings or structures. Where evidence demonstrates that tree planting is constrained, the policy should encourage complementary measures such as rain gardens, hedges, intensive green roofs and other multifunctional planting.

Modifications sought
Amend the policy and supporting text to:

- recognise the ecological and community value of undesignated green and blue spaces;
- address avoidable loss of undesignated green space;
- recognise highway landscaping and public realm as part of habitat connectivity;
- promote complementary greening measures where tree planting is demonstrably constrained;
- strengthen links with GHR4, GHR5, GHR7 and GHR8; and
- address prevention and management of invasive non-native species.

These changes would improve the policy's effectiveness and reflect the full range of spaces contributing to London's ecological network

GHR7: Green infrastructure and Urban Greening Factor

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council supports the objective of increasing multifunctional green infrastructure and welcomes the continued use of the Urban Greening Factor.

However, the Council considers that Policy GHR7 is not fully Justified or Effective because the relative values assigned to different interventions within Table 5.1 are not sufficiently explained and do not consistently reflect their biodiversity, drainage, cooling and placemaking functions.

The Council has particular concerns regarding:

- the relative values assigned to extensive and intensive green roofs;
- the comparatively low value assigned to rain gardens;
- the treatment of hedges;
- the value assigned to amenity grassland;
- the relationship between flower-rich grassland and flower-rich perennial planting;
- the use of differing units when comparing soil volume and canopy area;
- the use of three separate tree categories without sufficient explanation; and
- the low value assigned to permeable paving, which could inadvertently discourage its use within sustainable drainage strategies.

Rain gardens can combine drainage, biodiversity, cooling and placemaking benefits and may include shrubs, flower-rich planting and trees. Their value should reflect these multifunctional benefits.

By contrast, amenity grassland commonly offers more limited biodiversity and drainage benefits and should not receive a value that overstates its contribution.

Modifications sought
Review Table 5.1 and:

- publish the technical basis for the assigned Urban Greening Factor values;
- use consistent methods and units when comparing interventions;

- review the relative weighting of rain gardens, green roofs, hedges, amenity grassland and flower-rich planting;
- rationalise and explain the tree categories; and
- ensure the values do not discourage permeable paving, source-control drainage or other multifunctional interventions.

The Council recommends that the final values be supported by transparent evidence covering biodiversity, drainage, cooling, canopy, accessibility and placemaking outcomes.

GHR8: Accessible green space

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council supports the objective of improving access to high-quality green space and recognises the important contribution accessible green space makes to health, wellbeing, recreation, climate resilience and biodiversity.

However, the Council considers that the policy is only partly Effective because the relationship between accessible green space, Local Nature Recovery Strategies and the Plan's wider green-infrastructure policies is insufficiently clear.

Accessibility should not be assessed solely by reference to physical proximity. The quality, safety, inclusivity, function, ecological value and usability of green space are also important.

Further clarity is required regarding how GHR8 should operate alongside:

- Local Nature Recovery Strategies;
- flood-risk and drainage planning under GHR5;
- biodiversity and ecological networks under GHR6;
- urban greening requirements under GHR7; and
- heat-risk mitigation under GHR4.

Modifications sought

Amend the policy or supporting text to:

- clarify its relationship with Local Nature Recovery Strategies;
- strengthen cross-references to GHR4, GHR5, GHR6 and GHR7;
- recognise that accessibility includes quality, safety, inclusivity and usability as well as distance;

- encourage provision that delivers multiple environmental and community functions; and
- clarify how local evidence should inform the identification of deficiencies and priorities.

These changes would strengthen implementation of a policy objective the Council supports.

GHR9: Clean and healthy waterways

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council supports the objective of securing clean, healthy and resilient waterways. However, the Council considers that Policy GHR9 is only partly Effective because its scope, terminology and technical implementation requirements require clarification.

Scope
The policy should clarify its application to development affecting separate and combined sewer systems and to the full range of relevant water bodies and watercourses.

Water quality assessment
The reference to the Simple Index Approach should be supported by an appropriate cross-reference to the relevant technical guidance and concise explanatory text. This would help ensure consistent application by applicants and decision-makers.

River restoration
The Council supports the requirement to preserve space for rivers but considers that the policy should go further by positively encouraging restoration wherever feasible, including:

- daylighting culverted watercourses;
- naturalising channelised rivers;
- restoring riparian habitats;
- reconnecting floodplains; and
- supporting river-related biodiversity gains.

Riverside strategy principles

The wording should make clear where the riverside-strategy principles apply specifically to the River Thames and where they are intended to apply more widely.

Definition of waterways
The current supporting-text definition requires clarification. It is unclear whether "waterways" comprises:

- navigable rivers and canals;
- all rivers and tributaries;
- culverted or ordinary watercourses;
- docks;
- lakes and ponds; or
- reservoirs and other water bodies.

An unambiguous definition is necessary for consistent implementation.

Modifications sought
Amend the policy and supporting text to clarify its scope, explain the Simple Index Approach, strengthen expectations for river restoration, clarify the application of riverside principles and provide a clear definition of waterways.

These changes would improve implementation while retaining the policy's supported strategic objective.

GHR11: Cycle and car parking

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

The London Borough of Enfield supports the strategic objectives of Policy GHR11, including increasing active travel, improving cycle parking provision and reducing unnecessary dependence on private vehicles where sustainable alternatives are available.

The Council considers, however, that Policy GHR11 is not fully justified, only partly effective, and not fully consistent with national policy because it does not provide sufficient flexibility for boroughs to apply locally evidenced parking standards in differing local circumstances.

Positively Prepared

The Council agrees that the policy identifies important strategic needs relating to sustainable transport, active travel and efficient use of land. The supporting evidence also recognises the relationship between transport accessibility, development form and site optimisation.

However, the supporting evidence also demonstrates that London contains materially different development contexts and accessibility conditions. The London Context Map methodology report identifies distinct character settings across London, including Setting A, described as predominantly outer suburban areas characterised by detached and semi-detached housing and associated suburban uses, typically located in Outer London.

The Council considers that the policy should therefore better recognise the need for boroughs to respond to differing local transport accessibility, housing typologies and travel patterns when applying parking standards.

Justified
The supporting evidence recognises significant variation in accessibility, context, parking assumptions and development conditions across London.

The Optimisation Framework Methodology Report (Amended) (1) explicitly links density and development form to transport accessibility through the Sustainable Access Measure and London Context Map. The methodology states that higher densities are associated with higher levels of accessibility because less land is required for car parking, while differing site coverage assumptions allow for greater parking provision in lower accessibility locations. Parking provision, viability and contextual considerations are all identified as factors informing the framework.

The Council therefore considers that the underlying evidence base recognises variation in development conditions across London. However, it is not clear from the evidence reviewed why boroughs should be prevented from applying locally evidenced parking standards where local evidence demonstrates that alternative standards may be appropriate.

The Council is also unclear whether a reasonable alternative approach was assessed. While the evidence assesses differing accessibility levels and development contexts through the London Context Map and Optimisation Framework, it is not apparent that a policy option allowing boroughs to apply locally evidenced parking standards was considered alongside the preferred approach.

The Council considers that a reasonable alternative would have been:

A London-wide parking framework establishing strategic standards whilst allowing boroughs to apply locally evidenced variations where justified through accessibility, connectivity, local travel behaviour, development typologies, viability evidence or planned transport improvements.

The Council does not consider that the evidence sufficiently explains why such an approach should be discounted.

Effective
The Council does not suggest that Policy GHR11 is incapable of implementation. However, the evidence identifies differing delivery and viability conditions across London which are not fully reflected in the policy.

The London Plan Viability Study Phase 1 Report (July 2026) identifies a more challenging viability position in Outer London and concludes that viability weakens as density increases. The study identifies a viability tipping point in Value Band D and states that building above six storeys in Outer London is challenging in current market conditions.

The same study also notes that the Draft London Plan introduces flexibility in certain policy areas, including cycle storage, in recognition of impacts on layout efficiency and viability.

The Council therefore considers that the policy would be more effective if it provided greater flexibility for boroughs to respond to differing accessibility, viability and development conditions whilst still maintaining the strategic objective of reducing car dependency and promoting active travel.

Consistent with National Policy
The Council does not consider Policy GHR11 to be fully consistent with national policy.

Policy TR2 of the August 2026 NPPF states that development plans should set local parking standards and that those standards should take account of connectivity, opportunities for transport improvements, local car ownership levels and travel trends, development type, and the appropriateness of flexibility.

Policy PM13 further states that quantitative standards, including parking standards, should be justified by reference to local characteristics and needs.

The Council considers that Policy GHR11 limits the ability of boroughs to apply parking standards informed by local evidence and local circumstances. As a result, the policy is not fully consistent with the direction of national policy regarding locally derived parking standards.

Suggested Modification
The Council suggests that Policy GHR11 be amended to state:

"Boroughs may apply locally evidenced parking standards where justified through local plan evidence relating to accessibility, connectivity, local travel behaviour, development typologies, viability considerations or planned transport improvements,

provided that the overall objectives of sustainable travel, active travel and reduced car dependency are maintained."

Summary
The Council considers that Policy GHR11:

- identifies an important strategic need but does not adequately recognise differing local circumstances (Positively Prepared);
- is not fully supported by evidence justifying the restriction of borough discretion and does not clearly demonstrate that reasonable alternatives were considered (Justified);
- does not fully respond to differing development and viability conditions recognised elsewhere in the evidence base (Effective); and
- is not fully aligned with NPPF provisions supporting locally derived parking standards (Consistent with National Policy)

Chapter 6: Place visions and place-based approaches

PV1: Brownfield first Opportunity Areas

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Enfield Council supports the principle of prioritising previously developed land and recognises the potential contribution of Brownfield First Opportunity Areas to housing, economic development, infrastructure and regeneration.

This principle is consistent with the August 2026 NPPF, which supports accommodating as much development need as possible on previously developed land while ensuring that expectations are ambitious but deliverable and take account of infrastructure, local market conditions and the need to secure well-designed places.

The Council supports the policy's positive preparation in seeking to maximise sustainable brownfield capacity. However, it considers that Policy PV1 is not fully Justified, is not currently demonstrated to be Effective, and is not fully Consistent with National Policy.

Justified
The Council agrees that the Plan identifies important needs to prioritise brownfield land, coordinate growth, address delivery barriers and make effective use of land. However, previously developed land is not necessarily vacant, underused, surplus or readily developable.

This is particularly important in outer London boroughs such as Enfield, where brownfield land performs active strategic functions, including:

- industrial production;
- storage and distribution;
- freight and logistics;
- utilities and digital infrastructure;
- waste management;
- rail and transport infrastructure; and
- affordable workspace.

The economic evidence identifies a London-wide industrial land shortfall of approximately 270 to 430 hectares to 2050, depending on the extent to which land in

contracting industrial uses can be repurposed. All five strategic Property Market Areas, including the Lea Valley, are identified as being in deficit. The evidence therefore does not support a general assumption that brownfield land within BFOAs is inherently available for housing-led or mixed-use redevelopment.

Industrial land and repurposing
The evidence identifies an uncertain industrial land position for Enfield. Depending on the assumptions made about repurposing between industrial uses, Enfield moves from an indicative three-hectare surplus to a five-hectare shortfall.

The evidence also recognises that the appropriate position is likely to lie between the full-repurposing and no-repurposing scenarios. Some land will need to be retained for strategic industrial functions, while other sites may not have the accessibility, servicing capacity or plot configuration required by growing uses such as storage and distribution.

A projected contraction in one industrial sector should not therefore be treated as automatically releasing land for housing or other non-industrial development.

Industrial intensification
PV1 expects industrial capacity to be sustained while allowing for intensification. However, the evidence acknowledges that some industrial reprovision assumptions rely on theoretical forms of intensification that may not currently be viable or deliverable.

The evidence identifies 24 referable multi-level industrial schemes since 2021, of which only a quarter had progressed to construction. Although these schemes produced an overall floorspace uplift, they also involved gains in light-industrial floorspace alongside losses of general-industrial and storage-and-distribution floorspace.

Annex E capacities should therefore distinguish between:
- theoretical floorspace uplift;
- viable and deliverable intensification; and
- retention of operational capacity serving different industrial and logistics functions.

Strategic infrastructure land
The economic evidence does not fully quantify several uses that depend on industrial land, including utilities, rail, waste and recycling, open storage and self-storage. These uses account for a substantial proportion of London's industrial land.

The Council is therefore not satisfied that the BFOA boundaries and capacities fully account for land required for strategic utilities, transport, waste, digital and other infrastructure.

Reasonable alternatives

The Council is not satisfied that reasonable alternatives to the BFOA boundaries, capacities and approach to industrial land release have been demonstrated sufficiently clearly.

The industrial release evidence uses location within a residential-oriented BFOA as a factor when prioritising potentially suitable industrial land for housing release. An alternative designation-led approach was tested but rejected because it produced less housing capacity.

Further explanation is required to demonstrate that the preferred approach provides the most appropriate balance between:

1. housing delivery;
2. industrial and logistics needs;
3. strategic infrastructure;
4. freight accessibility;
5. business retention;
6. economic growth; and
7. local placemaking objectives.

Alternatives that should be assessed more clearly include:

- BFOA boundaries and capacities excluding operational strategic industrial and infrastructure land;
- scenarios retaining different levels and types of industrial and logistics capacity;
- lower or delayed industrial intensification;
- alternative housing and employment balances;
- infrastructure-led phasing;
- alternatives where borough evidence identifies lower deliverable capacity;
- retention of established businesses in situ; and
- downside scenarios involving delayed infrastructure, reduced grant or higher delivery costs.

Effective

The Council is not satisfied that PV1 establishes a sufficiently clear delivery pathway for the capacities identified in Annex E.

The policy and evidence do not provide sufficient clarity regarding:

- infrastructure requirements;
- funding and finance;
- delivery responsibilities;
- land assembly;
- viability and market absorption;
- transport and utility improvements;
- industrial intensification;
- retention or relocation of businesses;
- public-sector delivery capacity; and
- long-term stewardship.

The Phase 1 Viability Study is a pan-London, typology-based assessment. Its strategic outputs are indicative rather than determinative at individual site or location level. It does not establish that the capacity attributed to individual BFOAs is viable or deliverable, or that the associated industrial intensification, infrastructure, land assembly and business relocation can be funded.

The evidence indicates that positive development outcomes may rely on interventions including:

- grant funding;
- low-cost finance;
- public-sector or Registered Provider-led delivery;
- coordinated land assembly;
- masterplan consent mechanisms;
- upfront infrastructure investment; and
- long-term public stewardship.

Before BFOA capacity is relied upon, the Plan should identify whether these interventions are required, who will provide them and how they will be funded and governed.

The principal implementation barriers include:

- fragmented ownership and land assembly;
- competing housing, industrial and infrastructure requirements;
- limited industrial land availability;
- unproven forms of multi-level industrial development;
- operational constraints affecting co-location;
- transport and utilities capacity;
- business displacement and relocation;
- affordable-workspace retention;
- availability of grant and low-cost finance;
- public-sector capacity; and
- potential conflict between Annex E capacity and borough evidence.

Annex E capacities should therefore remain indicative and subject to borough-level testing through the statutory Local Plan process.

Consistent with National Policy

The Council supports the brownfield-first principle. Its concern relates to the respective roles of the Spatial Development Strategy, borough Local Plans and Opportunity Area Planning Frameworks.

A Spatial Development Strategy should identify broad locations and remain genuinely strategic. However, PV1 refers to designated BFOAs, applies policy requirements to development within them and directs Local Plans to realise strategic-scale capacity by reference to Annex E.

The policy should confirm that:

- BFOAs are broad strategic locations rather than formal land-use designations;

- BFOA identification does not constitute site allocation;
- Annex E capacities are indicative;
- BFOA identification does not predetermine industrial release or land-use change;
- OAPFs cannot replace or circumvent statutory Local Plan preparation; and
- Local Plans remain responsible for identifying sites, detailed land uses, infrastructure requirements and deliverable capacity.

Modifications sought

To make Policy PV1 sound, Enfield Council requests that the policy and supporting text be modified to:

1. Clarify BFOA status and methodology
   - Explain the evidence, criteria and methodology used to define BFOAs.
2. Describe BFOAs as broad strategic locations rather than formal land-use designations.
   - Clarify the status of capacity
3. Confirm that Annex E capacities are indicative and subject to infrastructure, viability and delivery testing through borough Local Plans.
4. Confirm that BFOA identification does not constitute site allocation or predetermine land-use change.
   - Protect strategic economic and infrastructure functions
5. Require capacities to be tested against industrial, logistics, freight, utility, waste and digital-infrastructure requirements.
6. Confirm that BFOA identification does not itself justify industrial land release.
   - Test industrial intensification properly
7. Distinguish theoretical floorspace uplift from intensification that is viable, deliverable and capable of retaining the required operational capacity.
   - Require location-specific delivery evidence
8. Identify the infrastructure, funding, phasing, land assembly, business-relocation and delivery arrangements required before strategic capacity is relied upon.
9. Require location-specific testing where delivery depends on major public intervention.
10. Clarify governance and plan-making
    - Clarify the respective roles of the London Plan, borough Local Plans and OAPFs.
11. Introduce monitoring and review where assumed infrastructure, market conditions or public interventions do not materialise.

Conclusion

Enfield Council supports brownfield-first development and coordinated regeneration. However, Policy PV1 is not fully Justified because the evidence does not yet demonstrate that the BFOA boundaries, capacities and industrial land assumptions represent the most appropriate strategy when considered against reasonable alternatives.

The policy is not currently demonstrated to be Effective because delivery may depend on significant infrastructure investment, industrial intensification, public funding,

land assembly, business relocation and public-sector intervention that have not been established for individual BFOAs.

PV1 therefore requires modification to protect strategic economic and infrastructure functions, preserve the role of borough Local Plans and ensure that capacity is locally tested, infrastructure-led, viable and deliverable.

PV2: Central Activities Zone

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

Yes

PV3: Town centres and high streets

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

Yes

PV4: Strategic economic clusters and corridors

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

We broadly welcome the aims of this policy as part of a wider strategy to support economic diversity, but it's not clear from the evidence why these specific sectors have been selected – they are not simply clusters of employment, as Figure 2.1 shows concentrations of employment which the draft Plan has not highlighted as existing employment agglomerations. It is not clear what reasonable alternatives have been investigated in this regard.

PV5: Industrial land supporting housing growth

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

We welcome the option for boroughs to consider the release of some well-connected industrial land (PV5 part A), subject to the very important caveats set out in A1 to A5.

However, we have concerns about the DM-led industrial release locations set out in table 6.2.

The Lee Valley PMA locations are:
- Blackhorse Lane SIL
- South Tottenham LSIS

We are mindful that Haringey evidence (the Haringey Employment Land Study) suggests 36,225 sqm of B-class employment floorspace at South Tottenham LSIS. Moreover, LBWF evidence (Blackhorse Lane SIL Masterplan Framework Stage 1) suggests 76,054 sqm of industrial floorspace at Blackhorse Lane SIL.

The significant amount of floorspace likely to be displaced as a result of this policy would place great pressure on other locations within the PMA. Given the proposed Green Belt Industrial Area in Enfield (at the M25/A10, marked as 73 on the Key Diagram) there is the danger that displaced businesses from these established brownfield locations add to the pressure for Green Belt development for industrial needs arising from other boroughs. This issue is compounded by the PMA-based approach to meeting economic needs set out in GLE2.

This approach is not consistent with the 'previously developed land first' approach set out in NPPF Policy L1.

PV6: Metropolitan Open Land

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

No

LBE response

Whilst we support the overall aim to protect and enhance MOL, the concepts and language used in the policy – appropriate/ inappropriate development, plan making exceptional circumstances, DM very special circumstances – echo the key terms used in national policy with regards to Green Belt. There is the danger that this approach would hamper the delivery of the intents of the policy, as there could easily be confusing that the more permissive approach to Green Belts introduced by national policy would be applicable to MOL.

PV7: Sustainable development and enhancement of the Green Belt

Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

LBE response

Yes

If you are seeking any modification to the plan, please confirm whether you would wish to appear at the Examination in Public, if requested to do so by the Inspector. If so, we will pass your details to the Inspector who will decide whether to issue a formal invitation to you at a later date. The Inspectors themselves would set the dates that the hearing would be held.

LBE response:

Yes

Please explain in the space below why you consider it necessary for you to attend the Examination in Public.

LBE response:

Enfield Council would wish to participate in the Examination in Public where invited, particularly in relation to the spatial strategy, Broad Locations for Growth, infrastructure and transport delivery, optimisation, tall buildings and associated viability issues. These matters have significant implications for Enfield's future Local Plan, infrastructure planning and delivery of sustainable growth. Written representations set out the Council's position, but participation may assist the Inspectors where clarification of the borough-specific evidence, implementation implications or modifications sought is required.