



Examination of the Enfield Local Plan 2019-2041

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IN14: Post-hearing advice

Introduction

1. I write following the examination hearing sessions which concluded on 19 March 2026. I committed to writing to the Council to set out any further Main Modifications (MMs) or steps required to make the Enfield Local Plan (the Plan) sound and legally compliant.
2. Unless stated otherwise or superseded by these actions, the modifications and actions set out in documents E6.1, E9.2 and O4 should be taken forward for my consideration. Where a policy or allocation is not referred to below, I have nothing currently to add. I may refine the wording of existing suggested modifications or conclude that some are not essential to soundness prior to any consultation on MMs taking place.
3. As a general reminder, I can only recommend MMs where they are necessary to make the Plan sound and/or legally compliant and for no other reason. MMs should only be drafted to respond to stated actions. Other MMs that may have been suggested by the Council in hearing statements or statements of common ground should only be made where I refer to them specifically below.
4. The Council may decide to draft additional or minor modifications that do not materially affect a policy, such as correcting factual errors or typographical mistakes, but these are outside the scope of the examination and should not be included in the MM schedule.
5. Importantly, the actions below may supersede those discussed at the hearing sessions. I made it clear that any actions discussed during these sessions were without prejudice to my final decisions. This includes situations where I now consider an allocation to be unsound in principle and cannot be made so by any modifications to policies. There are also instances where further evidence or discussion has rendered earlier actions and/or suggested modifications moot. The actions below may also result in consequential changes to supporting text, other relevant policies and the Policies Map. Even if not referred to specifically, the Council should be alive to these issues when drafting modifications for my consideration. For the avoidance of doubt, where I refer to several modifications to

a policy or supporting text, these should be combined into a single MM for each policy or supporting text.

6. My final conclusions regarding soundness and legal compliance will be given in my final report. Nevertheless, to assist for now, I shall give brief explanations for my initial advice below where necessary.
7. Finally, as confirmed in my guidance notes and hearing sessions, the Plan has been examined under the December 2023 version of the National Planning Policy Framework. This is consistent with the relevant transitional arrangements. References to national policy are therefore in relation to that document and not anything published since.

General Matters

8. A significant concern throughout the examination thus far is the internal consistency of policies in the Plan and the amount of duplication that exists, which can lead to ambiguity. Many examples of inconsistency have already been identified, with further examples below. In drafting modifications to address this, the Council may determine that some policies are no longer necessary and/or could be subsumed within other policies. I am content for the Council to make these suggestions for my initial consideration if this is more likely to result in a clear and effective approach.
9. There have been several discussions about use of certain language, such as “should” and “must” and that, in many cases, it appears these words have been used interchangeably, but in other cases they have not. This creates ambiguity. I have already identified examples where changes are needed to provide certainty, and some others are set out below. However, in the first instance, and in the spirit of the discussions that have taken place, I would ask the Council to review the policies and ensure the correct wording has been used in all instances, particularly within allocations.
10. Further to the above, the Plan often uses wording such as “resisted” or “refused” interchangeably. If the Council contends that, in practice, these mean the same thing then the same wording should be used in all relevant policies. If not, then the Council should review the policies to make sure the correct intended wording is used and that its meaning for decision making is understood.
11. In addition, policies often use phrases such as “development should respond to” or similar. In my view, this type of language is ineffective as it does not indicate an outcome. The Council should identify such examples and suggest modifications to phrases such as this to make it clear to a decision maker what outcome is intended. For example, development may be expected to complement, preserve, protect or perhaps enhance the area in which it sits rather than simply “respond” to it.

Crews Hill – policies PL11 and SA11.1-SA11.6

12. The Kings Oak Plain area is not intended to be part of the developable area. Nor is it necessary to remove this land from the Green Belt for open space, biodiversity or landscaping mitigation or enhancement associated with the wider development. Therefore, there are no exceptional circumstances to remove this area of land from the Green Belt. The Council should draft modifications to ensure the Kings Oak Plain area is retained in the Green Belt and the boundaries modified on the inset maps and Policies Map accordingly.

13. Similarly, most of the golf course is seemingly intended to act as open space. As such, it is unnecessary to remove all this land from the Green Belt. The creation of a new defensible boundary by the development itself would be preferable to rolling back the Green Belt boundary excessively and risking even greater encroachment than currently anticipated.
14. The golf course is also identified as a Grade I Site of Importance for Nature Conservation (SINC). The Plan refers to limiting development to areas of lowest ecological value in the northern part of the site, without establishing a clear boundary. This is vague and the indicative nature of Figure 3.14 does not provide great comfort or clarity. Given the area's sensitivity, there is insufficient certainty about what may come forward and the extent to which general policy protections would be sufficient in ensuring protection of the SINC. Moreover, reference in SA11.2 to development taking place on areas of heavily managed grassland such as fairways and greens do not necessarily tally with what is said elsewhere. As submitted, there would be little to limit development taking place within the wider golf course.
15. The Council should draft modifications to identify the extent of development to be permitted within the SA11.2 area, set out requirements for the creation of a clear boundary to the remaining Green Belt and mitigation/compensatory measures for any areas of lower biodiversity value that might be affected. This should focus on any areas of previously developed land associated with the golf club. Land outside of the developable area should be retained as Green Belt. This would still be compatible with the vision for the area as open space.
16. An alternative approach, which would also be acceptable to me, would be to retain all of the SA11.2 area within the Green Belt and for Cattlegate Road and the far edge of the SINC running along the railway corridor to be the new Green Belt boundary. I do not consider the reduction in delivery of 200 dwellings would undermine the justification for the overall placemaking area. The Council should therefore consider this option in the event that an appropriate boundary cannot be identified that would protect the more valuable areas of the SINC and limit unnecessary encroachment into the Green Belt. The Council should also ensure that Policy PL11 and/or relevant allocations make adequate provision for the protection of the remaining areas of SINC and for new development to create defensible boundaries to the Green Belt.
17. With regard to the railway corridor SINC, other than where it would be isolated from other Green Belt, such as between SA11.1 and SA11.3, I also see no reason why this area should be removed from the Green Belt. Again, the SINC is not intended to form part of the development and can form a new defensible Green Belt boundary, particularly in light of my findings on Kings Oak Plain and golf course. There are no exceptional circumstances for removing these contiguous areas from the Green Belt. Modifications should therefore be drafted to redraw the Green Belt boundary accordingly.
18. The evidence suggests there may be scope for development in some parts of the Glasgow Stud SINC, subject to normal considerations and mitigation. However, as with the golf course, neither the evidence nor the Plan itself suggests that all areas would be suitable for development. Where these are on the edge of the placemaking area, and contiguous with the remaining Green Belt, I see no reason for these areas to be removed from the Green Belt. Again, the exceptional

circumstances needed to alter the boundary do not exist. Even where the vision includes active travel routes through these areas, this would not necessarily be incompatible with Green Belt function or policy. There should also be scope to create new defensible Green Belt boundaries without unnecessary removal of land.

19. The Council should therefore draft modifications which limit Green Belt release in or around the Glasgow Stud SINC to those areas where development is intended or where it would otherwise leave an area of Green Belt to be disconnected or isolated from the remainder.
20. With reference to parcel SA11.6, apart from the potential for a school, Figure 3.14 does not suggest there is any intention to deliver new development on the eastern side of Theobalds Park Road or within the conservation area. While I acknowledge the figure is illustrative, it is based on the placemaking evidence documents, and these do not identify these areas for new housing development. On this basis, there are no exceptional circumstances that would justify the removal of these areas from the Green Belt either. There should be ample opportunity to create revised boundaries that meet the expectations of national policy without rolling back the boundary to this extent. Modifications should therefore be drafted which retain any areas in the Green Belt that are not expected to be subject to 'inappropriate' development.
21. For clarity, it is not unsound for these areas to be within the placemaking area if they are to form part of the overall vision, but there are no exceptional circumstances for removing them from the Green Belt where they are not intended to include new development and where what is expected would be broadly consistent with Green Belt function.
22. Turning to the policy itself, criterion 2 refers to the preparation of a masterplan. It is not unusual for policies such as this to refer to the need for detailed masterplans. However, while this provides some guidance on how it will be prepared, it should be modified to make it clear when in the process, and by what mechanism, the masterplan should be agreed. This will ensure consistency with Policy PL10. This criterion also refers to 'adopting' the masterplan as a Supplementary Planning Document (SPD). Given recent changes to planning legislation, this would no longer be permissible and thus this reference should be deleted. I am content, however, that between Policy PL11 and the allocation policies, the Plan provides an effective policy framework in principle such that the lack of an approved SPD would not be problematic.
23. To ensure effectiveness, the policy should also be modified to make it clear that development which would prejudice the delivery of the wider placemaking vision will not be permitted.
24. As per the agreed action for Policy PL10, criterion 7 should be modified to remove reference to "exploring" the provision of Gypsy and Traveller pitches. The Council has committed to producing a separate plan to deal with this issue and no part of the exceptional circumstances for removing this land from the Green Belt relates to the provision of Gypsy and Traveller accommodation. Planning Policy for Traveller Sites is also clear that land removed from the Green Belt to meet Traveller needs should be allocated specifically for that use. This would not be the case here and thus this criterion, and the equivalent in Policy PL10, would also be contrary to national policy and should be removed.

25. To be clear, I am not concluding that the allocation would not be suitable for Gypsy and Traveller sites or pre-judging what may or may not be in the Traveller Local Plan. My conclusion is purely that the case for including reference to Gypsies and Travellers in *this* policy, or Policy PL10, has not been made.
26. Elements of the policy should be modified to clearly identify mandatory requirements. This includes, but is not necessarily limited to, reviewing the wording of criteria 4, 8, 10, 11b and 19 to make it clear these are factors that developers *must* provide as part of any comprehensive scheme. This will ensure effectiveness.
27. Criterion 15e suggests a range of densities should be provided, with some broad guidance that higher densities should be east of Crews Hill station and in areas with highest public transport accessibility. Criterion 15f provides further guidance on densities. However, neither Policy PL11 nor the individual allocations provide any clarity on what specific densities would be considered appropriate. Given the sensitivity of some areas, this approach is not effective. As such, the Plan should be modified to provide a clearer indication of where the Council considers higher densities to be appropriate (or inappropriate) and a broad indication of what those densities might be. There should be some scope for flexibility, but what is considered 'high' density in the context of this location should at least be indicated. The densities should be based on the Crews Hill Placemaking Study or associated documents.
28. Similarly, there are areas within the placemaking area that may be sensitive in terms of building heights, particularly in relation to important views. The Plan should be clear where limitations on height would apply and what those should broadly be. Modifications to either Policy PL11 or individual allocations should therefore be drafted to provide greater clarity on these matters. I note that some of the allocation policies for Chase Park sites include more information on typologies and heights than for Crews Hill. To ensure effectiveness, I consider similar information should be included in the Crews Hill policies.
29. Criterion 15k should either be deleted or modified to simply provide a cross-reference to relevant energy efficiency policies. Assumed connection to a heat network, for example, may not be consistent with those policies as modified.
30. Heritage matters are dealt with under individual allocations. However, unlike for biodiversity, Policy PL11 does not make any specific reference to protection of heritage assets. Remedying this in the overarching placemaking policy will help to embed the protection of heritage assets into the overall vision for any development. To ensure effectiveness, the Council should draft modifications to identify key features of importance and how development will be expected to address this, including any specific buffer zones or exclusions that would be expected.
31. Actions for criterion 17a and b have already been agreed. These are to ensure better consistency with national and local policies on biodiversity. As noted above, there may still be some potential for development to take place within parts of the golf course and Glasgow Stud SINC. Even if in areas of lowest biodiversity value, any development would still need to be considered against wider biodiversity policies. While individual allocations set out some guidance on this matter, the overarching strategic policy does not. To aid effectiveness, modifications are needed to Policy PL11, its supporting text and associated inset maps, to provide comfort in relation to any retained areas of SINC and clear guidance on what should happen in the event of development coming forward. In addition, criterion 17d

should be modified to require a buffer of “at least” 50 metres. This would allow a decision maker to consider whether a larger buffer would be needed in some circumstances.

32. For the avoidance of doubt, the Council should draft modifications which ensure a degree of consistency across both policies PL10 and PL11, and any associated allocations, regarding sustainable transport and accessibility. While Policy PL10 refers to the 75% target on sustainable mode share, this is not replicated in Policy PL11. Modifications to criterion 18 should be drafted to address this. Similarly, while the need for a comprehensive approach is established in principle, to ensure effectiveness the policy should be clear that this also applies to the delivery of transport and an overarching strategy for public transport and any associated improvements.
33. More generally regarding comprehensive development, the policy should include what is set out in paragraph 3.171. This would elevate the expectations regarding ‘equalisation’ to policy thus ensuring effectiveness.
34. Criterion 18fg should be amended to allow greater flexibility in relation to routes for active travel along the corridor valleys of Turkey Brook and Cuffey Brook, both in terms of the routes chosen and nature of active travel. Both corridors are sensitive, particularly in relation to biodiversity, and thus care would be needed to ensure any infrastructure works do not result in unacceptable harm. This criterion should include reference to any routes being compatible with, and not harmful to, biodiversity assets. The policy should also not rule out alternative routes that may offer the same benefits or result in less potential harm.
35. Criterion 18i should be amended to make it clear that the factors referred to are only examples. There should be no suggestion that addressing road capacity is limited to land west of the railway line only. The Plan should require any network capacity issues to be adequately mitigated. Reference to appropriate mitigation would also be more precise than “addressing limitations”.
36. While this may come under the auspices of the agreed action to reduce duplication, the Council should review criterion 19 to determine what, if any, elements are necessary to retain. This criterion refers to issues set out elsewhere, including provision of blue and green infrastructure and open spaces (criterion 17), provision of schools (criterion 11) and provision of a local centre (criteria 8 and 18). In terms of school provision, there is reference to provision being made “subject to updated need requirements” which does not appear in criterion 11. It is this sort of inconsistency which makes unnecessary repetition problematic. If there are detailed elements in criterion 19 that would be better located in other criteria then these should be retained but moved.
37. Finally, and for the avoidance of doubt, Figure 3.14 should only be updated to ensure it is accurate and reflects the agreed actions. Any additional changes the Council may wish to make to reflect on-going masterplanning work are not before me and thus should not be incorporated into the modifications. There is also some considerable difference between Figure 3.14 and Figure 3.12 for Chase Park, not least in terms of how retained Green Belt is identified and neighbouring uses that are outside the placemaking areas. A consistent approach to inset maps would reduce any potential ambiguity about the extent of Green Belt release and what is being proposed.

SA11 allocations

38. The Council must ensure that there is consistency across the allocations in relation to infrastructure provision and delivery, particularly in relation to any situations where contributions would be required from across the placemaking area to deliver infrastructure in one particular 'SA11' allocation (for example, if a school is to be delivered in SA11.1 then it should be clear whether this is to be financed by development in SA11.1 only or from development across the PL11 area). Any changes necessary, should be included in the MMs required for each allocation and set out below, for effectiveness.
39. The Council will also need to review the policies to pick up any consequential changes needed to reflect the actions set out above.

SA11.1 – Land north of Cattlegate Road, Crews Hill

40. The policy should be modified to make specific reference to how effects on the setting of Owls Hall Farm, or any other nearby heritage assets, should be minimised and assessed (note criterion C only relates to the effects of the bridge). Criterion D should be modified to link the required buffer to the objective of helping to preserve the setting of Owls Hall Farm. Without this, there would be no way of assessing whether any buffer would be satisfactory in scale or nature and whether it would be effective. Criterion I should be "must" to be consistent with other similar criteria.
41. The intentions and requirements of criterion H are unclear. Modifications are needed to provide clarity. This could include deletion or cross-reference if the intention is simply to reflect other transport policies.

SA11.2 – Land South of Cattlegate Road, Crews Hill

42. Criteria C and D should be modified to be "must", as per criteria A and B. Criterion E should refer to the expansion of active travel as a "must", though if the bridge is not a guaranteed requirement at this stage, then it could be identified as a possible means of achieving the overall objective.
43. There is an inconsistency between criterion V, which refers to a new pedestrian and public transport bridge and criterion E, which refers to a new cycle and pedestrian bridge. The policy should be modified to be clear and consistent.

SA11.3 – Land South of M25, Crews Hill

44. The Council should draft modifications which address how development should minimise any harmful effects on heritage assets in the area and how they will be assessed. Criterion F should reflect on ensuring any "sense of approach" is intended to preserve the setting of The Paddocks. Further to actions referenced elsewhere, several criteria under SA11.3 refer to "should". To be consistent with the approach elsewhere, both versions of criteria E, F and H should be modified to be "must". In relation to the second criterion E, there should be clearer guidance as to what constitutes higher density development in the context of this parcel of land (as set out above).

SA11.4 – Land North and South of Cattlegate Road, Crews Hill

45. Criterion G should be modified to provide greater clarity and certainty about what constitutes higher or lower densities in this parcel. Criterion J should be modified to require a segregated cycle path where it is possible to provide one. Criteria G, H, I, and K should be amended to be "must" requirements.

SA11.5 – Land east of Theobalds Park Road, Crews Hill

46. My understanding is that development is not expected within the SINC in this parcel. As such, criterion A needs to be clear that development is only expected *outside* the SINC. Further to this, provision should be made within the policy for protection of the SINC itself.
47. Criteria D, E and G should be “must”.

SA11.6 – Land South-west of Theobalds Road Park, Crews Hill

48. Criteria C, D, E, H and L should be “must” for effectiveness.
49. The buffer referred to under criterion C should be “at least” 50m from the ancient woodland. As elsewhere, the purpose of the buffer to protect the woodland should be identified so that decision makers will be able to determine whether any subsequent proposal is meeting its purpose. Similarly, criteria K and/or L should include reference to the Clay Hill conservation area. The need to assess any effects on the conservation area or its setting also need to be incorporated into the policy for consistency and completeness.

Chase Park – Policy PL10 and SA10.1-SA10.5

50. Document E9.2 already sets out a number of actions relating to Policy PL10 and associated allocation policies. As with the actions set out for Policy PL11, there is scope for the Council to review the policy and ensure any examples of unhelpful repetition and inconsistency in addition to those listed, are removed. The Council should also consider whether any of the actions set out above for Crews Hill should also apply here, including ensuring consistency in matters of transport and public transport, comprehensive development and delivery.
51. For the avoidance of doubt, Figures 3.11 and 3.12 should only be updated to ensure they are accurate and reflect the actions set out below. Any additional changes the Council may wish to make to reflect on-going masterplanning work are not before me and thus should not be incorporated into the modifications. Any modification should however include removal of the area of residential development identified south of Hadley Road, which was included in error.
52. I am content with the wording of criterion 13c in terms of what the country park extension should entail and there is no reason for this to change. However, to ensure consistency, any other references to the country park extension, including in SA10.3 and SA10.4, should use the same language or provide a cross reference back to this criterion.
53. Given the extension of the country park is a key part of the mitigation for this allocation, then it is important that it is delivered as envisaged. Therefore, to be effective the policy should include a mechanism that ensures the country park extension is delivered in a timely manner alongside the delivery of any housing. The Council should draft modifications to achieve this. Criterion 16 already refers to the delivery of social and physical infrastructure ahead of, or in tandem with, the development. It also refers to provision of blue and green infrastructure within that bracket. Thus, it may be that the delivery of the country park, as envisaged under criterion 13c, could be added into this criterion for the avoidance of any doubt.
54. As with Policy PL11, to ensure a comprehensive approach to development is achieved, supporting text on ‘equalisation’ should also be elevated to policy.

55. The policy refers to densities several times and gives some indication of where higher densities might be acceptable. However, there is no indication of what 'higher' density means in the context of this placemaking area. Therefore, either in Policy PL10 or in the individual parcel policies, the Council should draft modifications which identify what densities would be considered acceptable. While I appreciate there is a need for some flexibility, it is still necessary for the policy to provide a greater level of guidance and comfort about the nature of development proposed.
56. In relation to Trent Park, the Plan needs to provide more clarity as to what is required to "respect" its significance and setting. Although Figure 3.12 suggests a buffer would be created between any housing and the park, this is only illustrative. If a suitable buffer is the expectation than both Policy PL10 and relevant 'SA' policies should be modified to make this clear, along with an indication of the minimum size that would be and a clear indication of its purpose. This should ensure that a decision maker is able to determine whether any buffer is fit for purpose.
57. As per Policy PL11 the policy should be modified to include clear reference to the need to minimise and mitigate any impacts of development on the transport network. Mitigating any capacity issues that may arise is not specifically referred to and thus criterion 15 should be modified to include something to this effect.
58. Criterion 16b should be modified to properly reflect the biodiversity mitigation hierarchy or provide a cross reference to relevant biodiversity policies. Provision of school playing fields within the SINC should only be contemplated where there would not be an unacceptable impact on biodiversity assets. Given the scale of the placemaking area, it need not be assumed that the playing fields would need to be in the SINC. The Council should draft modifications to make this clear.
59. Again, as with Policy PL11, modifications are necessary to criterion 14 to ensure it is clear that any public transport improvement or mitigation strategy should be comprehensive in the same way as other infrastructure requirements. Finally, criteria 13d and 13e should be modified to read "must" to ensure effectiveness.

SA10.1 – Land at Chase Park, South

60. Not referred to in document E6.1 or E9.2 is the need for modifications to ensure the inset map is accurate with regard to the extent of the developable area and Green Belt boundary. Given Figure 3.12 is illustrative only, the policy should also be clear that there is no intention for development to take place within the SINC. Criteria E and G should be "must" rather than 'should'.
61. Further to my comments on Policy PL10, reference should be made in criterion G to the need to provide a suitable buffer to Trent Park and the reason the buffer is needed.
62. The policy should also include reference to protecting the living conditions of existing residents south of Enfield Road. It should also highlight the expectation of the delivery of green corridors through this area to the remainder of the development, as suggested by Figure 3.12.

SA10.2 – Arnold House & Land to the rear

63. Criterion A should be modified to firstly be clear that development is not intended to take place within the SINC and secondly that any development, including pedestrian routes or green infrastructure requirements, would need to be subject to

the assessment and mitigation of potential impacts on the SINC and/or the wooded area, including any protected trees.

64. Criteria I and K should be modified to be “must”. Criterion J should be modified to make proper reference to the parking standards that will be used.

SA10.3 – Chase Park North East

65. Criteria B, C and E should be “must”. For consistency, language relating to the country park must be consistent with that used in Policy PL10 and/or provide a cross reference to the relevant part of the policy.
66. Modifications should be made to criterion E to set out what the purpose of the buffer would be, such that it would be possible for decision makers to determine whether any proposal would be “suitable”.

SA10.4 – Chase Park North West

67. Criterion B should be consistent with, or provide a cross-reference to, Policy PL10. Further to E9.2, and my comments on Policy PL10, reference should be made to the provision of a *suitable* buffer to Trent Park.

Other Green Belt Allocations

RUR.02 – Land between Camlet Way and Crescent Way

68. As well as being within the existing Green Belt, this allocation sits within an Area of Special Character (AoSC) on the edge of the Borough. This connects to a wider area of open countryside beyond. It forms a distinct edge to the built-up area. The site also borders the Hadley Wood Conservation Area and a SINC. It is therefore a highly sensitive location.
69. The Green Belt assessment concludes that harm to Green Belt purposes here would be high. When compared to the assessment of some other areas, I consider this to be an underestimate. Even with mitigations in place, including the potential actions set out in document E9.2, development of the scale and nature proposed would also have a significant detrimental effect on the existing character of this area. It would effectively delete the AoSC on the edge of the Borough. Given the site’s scale, there would be little scope to mitigate this impact. Development would also be likely to have a detrimental impact on the setting of the conservation area, not least if development of up to 18 metres were to be proposed (as the policy would allow for). Reducing the potential scale of development would likely reduce the capacity and thus any associated benefits, negatively affecting the case for development.
70. I am, of course, mindful that development at Crews Hill and Chase Park would also have very significant effects on the Green Belt and an AoSC. There may also be some effects on heritage assets. However, the benefits associated with these developments far exceed what is being suggested here. Moreover, the size of those allocations will allow a far greater degree of mitigation or enhancement to be provided that could help to minimise those impacts. This is not the case here.
71. There are some benefits associated with the allocation. The site is close to a railway station and some existing facilities. It would also provide family housing, which the existing Neighbourhood Plan has specifically identified a need for. Nevertheless, I am not persuaded that these benefits are sufficient to outweigh the

harm that would be caused, either to the Green Belt or the character of the area. Potential modifications to the Plan would not alter this.

72. For these reasons, I do not consider the exceptional circumstances needed to demonstrate removal of this site from the Green Belt have been demonstrated. Accordingly, the Council should draft modifications deleting the site from the Plan, reintegrating the land into the Green Belt and making consequential changes to the other relevant policies and the Policies Map.

RUR.04 – Land east of Junction 24

73. I do not consider this allocation is soundly based and the potential actions set out in document E9.2 would not alter that conclusion. The allocation would result in a very high degree of harm to Green Belt purposes and would, in effect, create an isolated 'hole' in the Green Belt near to Junction 24 of the M25. This would not extend the existing urban edge but rather create an entirely new pocket of built form in an area where there are currently only sporadic buildings. Notwithstanding the proximity of the motorway junction, the area retains a relatively rural character, particularly when heading into Enfield.
74. The introduction of large industrial or logistics buildings into this area would also result in a similarly high degree of harm to the character and appearance of the area. While this would be the case with several other allocations in this Plan, including Chase Park and Crews Hill, the relative isolation and lack of similar development anywhere in the vicinity would emphasise and exacerbate the harm caused in this location. This could not be solved by landscaping or other design measures. Moreover, the relatively limited scale of development is not so significant that the benefits would outweigh the harm caused.
75. The allocation also wraps around a large single dwelling. Any development here would have the potential to have a significant detrimental effect on the living conditions of the occupants of this dwelling. Given the size of the site, and the relationship it has with the dwelling, it is not clear how the risk to living conditions could be adequately mitigated. It is also not clear the extent to which the site's potential floorspace capacity has taken this constraint into account. Any reduction in capacity to ensure adequate protection would consequently reduce the potential benefits of development.
76. I also have other concerns about the allocation, including whether a safe and suitable form of access could be provided. However, even if I tasked the Council with demonstrating a technical solution could be found to this, it would not mitigate other matters or alter my overall conclusion.
77. The allocation could deliver new employment floorspace and I have no doubt that there would be market demand for logistic uses close to a motorway junction. Nevertheless, market demand is not in and of itself sufficient to justify the release of land from the Green Belt. Given my findings on the employment land requirement, I am also content that this allocation can be deleted without significant effect on the Council's ability to meet the need identified.
78. The benefits of development proposed here do not therefore outweigh either the harm to the purposes of the Green Belt or the other important matters outlined above. For that reason, the exceptional circumstances needed to justify this specific allocation have not been identified. The allocation is therefore not consistent with

national policy and should be deleted, with consequential modifications to the Green Belt boundary, other relevant policies and the Policies Map.

RUR.06 – Land at Picketts Lock, RUR.07 – Whitewebbs Golf Course and Land at Tottenham Hotspurs Training Ground and RUR.08 – Sloeman’s Farm

79. These three allocations seek to allow development in the Green Belt, but there is no suggestion of the land being released from the Green Belt itself. The Council has accepted that, with particular regard to RUR.06 and RUR.07, significant built form is a likely outcome of any proposals on these sites. From what was discussed, it would be wrong to conclude that what is expected on these sites would fit into any Green Belt exception in national policy.
80. It seems inevitable therefore that such development would not preserve the openness of the Green Belt and thus would be considered inappropriate development in the Green Belt in terms of national policy. To be considered acceptable, any development would therefore need to demonstrate ‘very special circumstances’ (VSC).
81. There, of course, can be no guarantee that the VSC test would be passed. The Plan provides little clarity on what is expected from these developments in terms of scale or nature. For example, RUR.06 states the site “*could* provide new sports, leisure and recreational facilities”, RUR.07 states the site “*could* provide professional sport, recreation and community sports/leisure uses, including ancillary related facilities”. There is very little specificity about any scale of development or what the Council considers would be sufficient to meet the wider VSC policy test and so no way of knowing what degree of Green Belt harm is likely to be acceptable, what benefits would be necessary to ‘pass’ the tests or whether the mitigations identified would be sufficient.
82. If the Council were intent on limiting the nature of development to that which meets the Green Belt exceptions, then this might be acceptable. However, it is quite clear that this is not what the Plan is proposing, certainly with regard to RUR.06 and RUR.07. In these circumstances I am not persuaded that it is appropriate to allocate land in the Green Belt for what amounts to ‘inappropriate development’ without proper assessment of the degree of harm likely to the Green Belt or what the Council would be willing to accept.
83. Moreover, the allocations would provide no certainty that any proposal would be considered acceptable in principle. In effect, the policies defer to national policy. This seems to negate the purpose of an allocation, particularly in the Green Belt, where matters of principle are at stake. It is telling, in my view, that as VSC would have to be addressed in any event, deletion of these allocations would have no real bearing on what may be proposed or whether such development would be considered acceptable in principle. By definition, they would be ineffective.
84. I acknowledge that that the situation is less clear cut for RUR.08, where the scale of development is likely to be less significant. However, there remains a lack of clarity to my mind as to what the final form of development would be and whether it would meet the Green Belt exceptions or not. As noted above, removal from the Plan would not prohibit a proposal coming forward and being considered in the same way as they would now. With or without the policy the test would be the same.
85. The Council has suggested that the allocations are needed to ensure any development comes forward in an acceptable way and provides adequate

mitigation. I do not accept this is the case. Modifications could be made to other policies to ensure proposals which come forward in 'Rural Enfield' provide certain mitigation and I would be content for Policy PL9, or other relevant policies, to set out what would be expected from any development coming forward in the Green Belt.

86. On this basis, the Council should draft modifications to delete these allocations from the Plan and add criteria to Policy PL9 or other relevant policies that would ensure development otherwise considered acceptable in principle provides appropriate mitigation. This should also establish broad principles for how development should be sited to minimise impacts and what mitigation would be needed. The allocation policies may provide the basis for what would be expected more generally across Rural Enfield.
87. For the avoidance of doubt, these conclusions have no bearing on the permissions that have already been granted. I am not suggesting that the forms of development proposed or permitted are not capable of meeting the national policy tests. Rather, I am concluding that the policies as drafted are not effective and are not capable of being made so through modification.

RUR.01 – Land opposite Enfield Crematorium

88. While I have no objection in principle to a church being included as an acceptable use on this site as part of any mix, the primary justification for this site is for housing development. This should be delivered as a minimum, and the policy should be modified to be clear that the church is not a mandatory requirement but that such a use would be acceptable in principle. However, it is also important for the policy to be clear that the housing must be delivered in advance of, or as part of, any approved scheme. Given the status of the site, and the justification for removing it from the Green Belt, it would not be appropriate for the church to be delivered without the housing. Modifications should therefore be drafted to include a mechanism to ensure the church cannot be delivered in isolation.
89. In addition to the actions already agreed, the modifications should include that to criterion M agreed with TfL.

Housing Land Requirement

90. In the first instance, the Council will need to update the housing trajectory to take account of any modifications set out in this letter. Given the supply headroom, it is not necessary for the overall housing requirement to change as a result of these actions.
91. Modifications should also be drafted for my consideration which set out a revised stepped trajectory based on the most recent data before me and taking account of any changes due to this letter. To ensure conformity, the stepped requirement should reflect the London Plan annual requirement up to 2029. After this, the 'stepping' should ensure the Council can demonstrate a five-year supply from the likely date of adoption.
92. This will require a short-term reduction in the annual requirement after 2029. However, this would not alter the overall requirement over the first 5 years of the Plan following adoption and thus increasing the requirement in the early years should not be problematic. Subsequent to this, the stepped requirement will clearly need to ensure that the shortfall in delivery against the London Plan from the start

of the plan period is delivered as quickly as possible, in line with the Council's most recent information.

93. We discussed the Council's bespoke approach to dealing with this shortfall during the hearing sessions. Given the level of provision the Council has identified, including removing land from the Green Belt, nothing would be gained by increasing the requirement in the short term to include this shortfall within the first five years of the Plan. This would likely mean the Council would not be able to demonstrate a five-year supply at the point of adoption, which would be counterproductive. Moreover, there is little to no likelihood that the Council could identify additional *deliverable* sites at this stage in any event. It is therefore pragmatic to follow the Council's approach. The stepped requirement will therefore need to spread the existing shortfall against the London Plan across the remaining plan period as suggested after the first five years.
94. However, any *further* shortfall against the stepped requirement from the adoption of the Plan should be dealt with using the so-called Liverpool method. This would require any additional deficit to be spread across the plan period as a whole, including within the first five years of the Plan. The supporting text will need to be modified to explain this.
95. As a reminder, the Council should base the revised trajectory on the latest information before me and my actions and nothing else. If in revising these figures, the Council identifies any issues relating to the trajectory or 5 year housing land supply it should let me know as a matter of urgency.

Employment Floorspace Requirement

96. Policy SS1 identifies a requirement of a minimum of 304,000 sqm of net additional industrial and logistics floorspace over the plan period. This is based on completion data over the period 2016 to 2021. This trend-based data covers a relatively short period of time and does not include the most recent information before me. While the use of trend-based data may be acceptable in principle, I am not persuaded that the period used is truly reflective of past trends or likely delivery and thus may present an unduly optimistic outcome. On that basis, the 304,000 sqm figure is not justified.
97. Instead, the requirement should be based on the 2016 to 2024 period. This constitutes the most recent data before me. Use of a longer trend period can also help to address any peaks and troughs in delivery and account for any 'outlying' years in terms of performance. Looking further back would, however, include periods where delivery of employment land was significantly depressed due to wider economic issues. I acknowledge that this would skew the figures in a different way. The suggested 8 year period is a reasonable compromise.
98. Table 1 of the Council's Matter 3 hearing statement indicates that the 8 year trend figure would equate to a minimum requirement figure of just over 250,000 sqm (9,775 sqm per year). Even given my findings about some elements of the employment land supply set out below, there should be ample potential supply to meet this requirement. Modifications to Policy SS1 should therefore be drafted to amend the requirement figure as set out above.

Other Placemaking Policies (PL1 – PL9 and associated allocations) – General Matters

99. There are a number of matters which are pertinent to some or all of these policies. In some cases, these are reflected in documents E6.1 or 9.2 but to ensure consistency, I will set these out below.
100. Firstly, as well as ensuring all 'figures' associated with the policies are legible, they should be modified to remove features that have no bearing on the policies. This includes any references to 'infill opportunities'. This is necessary as there are no references to infill opportunities in the policies, nor has the Council seen fit to allocate them for development. Therefore, they have not been justified, and the policies are ineffective in relation to them in any event.
101. Where these policies refer to masterplans it should be clear who is expected to prepare them, what engagement with the public will be expected, when in the process they should be prepared and how they will be agreed. The Council should draft modifications which explain the expected mechanism. Where relevant, the policies should also be modified to include the provision that development which might prejudice the delivery of the overall placemaking vision would not be permitted. This will aid the effectiveness of the policies.
102. Secondly, in its various hearing statements, the Council has in many instances suggested a form of words be added to make it clear that the policies are only relevant subject to the scale and nature of any proposal within the placemaking area. For clarity, this would be necessary to ensure policies do not place unrealistic demands on all forms of development that may come forward and to ensure consistency with national policy. The Council should draft modifications to that end.

PL1 – Enfield Town and SA1.1 – SA1.7

103. In addition to those measures set out in Documents E6.1 and 9.2, Policy PL1 should also be modified to include the changes put forward in the Council's Matter 6 hearing statement, namely additional opening text establishing how the policy will be implemented, a new criterion referring to the Enfield Conservation Area and Management Plan and modifications to criterion 7 to provide a cross reference to Policies E4 and E7. Additionally, the suggested modification to criterion 9 set out in document E6.1 should be amended to make it clear that it refers to parking for new development only and not existing public parking. The Council should also add something to either the policy and/or supporting text to set out its approach to existing or future public parking in the town centre, including the extent to which the Council will accept or consider any loss of public parking spaces.
104. Due to uncertainty about the future of the site, and the likely need for it to remain in school use, site SA1.5 is unlikely to be delivered. As such, this allocation is not justified and should be deleted (along with SA1.6, which I understand is now complete).

PL2 – Southbury and SA2.1-SA2.8

105. Criterion 2 refers to "the potential" for a local centre without explaining whether it is a necessity, where it would be located or how the 'potential' would be assessed in decision making (for example, what the consequences would be for non-delivery). This may cause some issues for applicants and decision makers as they would not be clear what they were expected to provide or contribute. The policy should therefore be modified to explain how, where and when the new local centre is

expected to be delivered. If the local centre is something to be encouraged rather than required, then the policy should clarify this.

106. Criterion 3 refers to applicants demonstrating how vital social infrastructure has been considered and addressed. However, it is not clear what infrastructure the policy is referring to or whether this would fall outside the scope of normal planning obligations. Similarly, the final sentence requiring the siting of such social infrastructure to be informed by a “comprehensive placemaking approach” is vague. As the allocations within the Policy PL2 area are not linked by ownership or geography and may not come forward at the same time, it is not clear how any applicant could meet this requirement. The policy also makes no reference to any masterplan, so it is unclear how this could be achieved. The Council should draft modifications which either delete this requirement or provide a clear explanation of what is expected.
107. Turning to SA2.1, I have seen nothing to suggest that this allocation is unsound in principle or that the mix of land uses put forward is inappropriate. While I acknowledge an earlier permission has expired, this does not mean that the policy should not establish a clear framework within which to consider any future proposals. To be effective, the Plan should establish a clear vision for the site, particularly given the development pressures that exist across the Borough. There seems no reason why the Council should not seek to promote a residential-led mixed use development on this allocation. In this regard, neither the allocation nor associated policy are unsound in principle.
108. However, I am mindful of the uncertainty regarding delivery and thus modifications to SA2.1 should be made to make it clear there is no expectation of delivery coming forward by a certain period and the housing will not count towards the developable supply. Even with this caveat, there is no reason why the policy should not be aspirational and establish what the Council would wish to see come forward.
109. I would be content for the Council to revise the capacity assumptions to reflect typologies if this would provide flexibility and consistency with other similar sites. It may also be that reference to minima in terms of the scale of development would provide a degree of flexibility. However, to remove all guidance as to the expected nature or scale of development, as suggested by the Council, would render the policy and allocation wholly ineffective. Modifications should therefore be drafted for my consideration which would provide some flexibility while maintaining an effective vision and policy framework for the site.
110. For SA2.8, the Council should review and modify the inset map to ensure it does not inadvertently stymie the delivery of the site by being overly prescriptive in terms of the location of certain features.

PL4 – Angel Edmonton and SA4.1 – SA4.5

111. For the avoidance of doubt, and contrary to document 9.2, the action for criterion 13 should be to delete any reference to development funding a study as this would not be justified or consistent with national policy on planning obligations. For the same reasons, criterion iv. of SA4.5 requiring funding of conservation area studies should also be deleted.

PL5 – Meridian Water and SA5.1 – SA5.8

112. In the first instance, the Council should draft modifications which bring the position on capacities and land use mix up to date. This should include the inclusion of any

additional plots or parcels that the Council has identified during the examination (exclusion of these, as referred to in the Council's Meridian Water note¹ would not be justified). This should also include any modifications resulting from the deletion of Policy E12 (see below). Consequential modifications to Figure 3.6 will also be necessary.

113. Meridian Water is more akin to Chase Park and Crews Hill in that it is entirely made up of allocations. The vision is also for a comprehensive and coordinated form of development controlled through a masterplan. As such, the policy should set out in clear terms what scale of development is expected to be delivered. This will establish the basis for how the comprehensive masterplan will be drafted and delivered. Modifications should also be made to ensure it is clear how comprehensive development will be achieved, including in relation to planning obligations across the area (as per Policies PL10 and PL11).
114. The overall office requirement is 40,000 sqm. All of this is intended to be located within Meridian Water. While I understand the reasons for not having a zero requirement for offices, I am also conscious that there is limited evidence of strong demand for such floorspace in the Borough. On this basis, overly stringent office requirements on Meridian Water could unreasonably stymie development coming forward on this important regeneration site. It may also be the case that, through further masterplanning activity, the distribution of offices across the placemaking area may change. Thus, if the aspiration for offices were to be met in a different way, or elsewhere through windfall development, then it would be unfortunate for these policies to unnecessarily constrain alternative schemes coming forward.
115. For these reasons, modifications to Policy PL5 and/or relevant 'SA' policies should be drafted which allow for some flexibility with regard to office provision. This could be through allowing alternative approaches where certain criteria are met including, but not necessarily limited to, evidence relating to marketing or demand. This would be consistent with the approach for 'losing' existing office space under Policy E4. The Council could also usefully include something within the policy to establish what alternative uses would be considered to be 'first preference' if alternatives were justified. This does not dilute the stated intention to deliver office space but will allow for some flexibility.
116. While reference is made to providing new connections and improving public transport, no specific reference to mitigating or avoiding transport problems is included in the policy. To be consistent with other similar policies, the Council should draft modifications to address this omission.
117. In terms of the 'SA' policies, as well as what has already been agreed, the Council should also draft modifications which ensure a clear and consistent approach to infrastructure provision across the area, including with regard to education.
118. For the avoidance of doubt, the modifications set out in document E6.1 to the vision are *not* necessary for the Plan to be sound. These would have no effect on the policy or its implementation.

¹ Published 25 September 2025

PL6 – Southgate and SA6.1 – SA6.3

119. Further to document E9.2, the Council should also modify criterion 6 of Policy PL6 to provide a cross-reference to Policy TC2, which deals with changes of use in town centres. This will ensure a consistency of approach.

PL9 – Rural Enfield and Policies RE1-RE4

120. Further to the actions set out in Document E9.2, Figure 3.10 also needs to be clear what parts of Enfield Policy PL9 applies to and remove any elements, including areas of Metropolitan Open Land (MOL) or other features that are not relevant to the implementation or interpretation of the policy. This will remove any potential ambiguity.
121. To that end, reference to MOL should also be removed from criterion 1. In addition, I consider criterion 1 to be somewhat misleading and inaccurate in its portrayal of Green Belt policy. It is not always the case that development in the Green Belt must be considered to have a “significant positive benefit”, neither is it justified to suggest that all development in Rural Enfield (which is effectively the Green Belt) must demonstrate such benefits. Criterion 1 should therefore be modified to make it clear what the overarching objectives of the policy are without creating unduly restrictive or unjustified requirements.
122. The purpose and implementation of criterion 2 is unclear. There is also unhelpful duplication with other policies, which the Council acknowledged in its hearing statements. In the first instance, the Council should draft modifications which clarify how criterion 2 would be used in decision making. If needed, any list of schemes or projects should exclude anything which is already committed, underway or complete. If the Council wishes to draw attention to these then they should be in the supporting text only. The policy should be limited to those schemes that developers would be expected to deliver or contribute to, particularly if part of delivering compensatory improvements for Green Belt release. Excluding the list of schemes, a modification along the lines suggested to criterion 2 in document E6.1 may be helpful.
123. Similarly, criterion 3 is ambiguous. Firstly, it is not clear how the ‘priority’ reference would be implemented. I am also not persuaded it is justified to resist proposals which solely provide for habitat creation, biodiversity net gain (BNG) or other forms of environmental benefit. The Council should draft modifications which either delete criterion 3 or amend it such that it is clear what the Council is seeking to achieve in terms of accessibility.
124. Criterion 4 is inconsistent with both national and local policies on assessing the effects of development on biodiversity assets and incompletely repeats other policies on BNG. This criterion should either be deleted or modified to provide cross-references.
125. I am content for reference to the Lee Valley Regional Park Authority, as suggested in document E6.1, to be included in the policy and supporting text as this does play an important role in planning in that part of Enfield and any omission would reduce the effectiveness of the strategy.
126. The Council suggested deleting policies RE1-RE4 due to the significant amount of duplication within them and between other policies in the Plan, and that they do not serve any particular purpose. I agree that for these reasons the policies are largely ineffective and raise problems of internal consistency. There are also instances

where the policies are not consistent with national policy. Deletion would have no effect on the protection given to the rural areas of Enfield or any positive 'enhancements' envisaged. Modifications should therefore be drafted which delete these policies. Any elements that the Council consider need to be retained should be subsumed within other relevant policies.

Homes for All

Policy H1 – Housing development sites

127. For the avoidance of doubt, Table 8.1 should be modified to reflect the most up-to-date housing capacities, taking into account any actions set out elsewhere or in this letter. The table should also be updated to remove any allocations that are to be deleted from the Plan.

Policy H2 – Affordable Housing

128. Criterion 3 provides for a degree of flexibility but is unclear about the circumstances in which this would be permitted or what it should be based on. As with Policy H3, it would be appropriate for the 'guideline mix' to be the starting point but that an alternative might be considered acceptable if there is new or alternative evidence which supports it. This could include both assessments of housing need and/or viability. Any flexibility should be within the constraints set in the London Plan, but that should be explained in either the policy or supporting text. The Council should draft modifications which provide clarity on the scope of any flexibility.

Policy H3 – Housing mix and type

129. In addition to the actions already agreed, criterion 1 needs to be modified to ensure there is flexibility in recognition of the dynamic nature of the housing market. Therefore, references to the Local Housing Need Assessment (LHNA) and successor documents should be modified to allow consideration of any up-to-date housing market information, including that produced at a sub-regional level.
130. Criterion 2 is not necessary as it is covered by Policy DE13 and thus should be deleted. Similarly, as well as being ambiguous, the objectives behind criterion 5 are more closely related to Policy DE13 and not housing type and mix. This should also be deleted. Paragraph 8.34 should be deleted as it is misleading and contradicts the policy.

Policy H4 – Small sites and smaller housing development

131. Notwithstanding the actions to criterion 2 in document O4, on further reflection, I am not persuaded that this criterion is effective. The criterion sets out where small site development will be "particularly supported" and includes several sub-criteria referring to such matters as public transport accessibility and access to services. However, the Council also indicated that these were not the only areas where small sites development might be considered acceptable and that the criterion was intended to provide an "attitudinal steer" to applicants and decision makers.
132. Such 'steers' are unnecessary and will not provide a decision maker with clear guidance on situations outside of criterion 2 where small site development would still be acceptable. Moreover, by not ruling out other locations, it provides no indication of where small site development would be unacceptable. As such, the Council should draft modifications to both policy and supporting text which provide clearer guidance on where small site development would, or would not, be considered acceptable in principle. This may be achieved by removing the strict

thresholds on Public Transport Accessibility Levels (PTAL) ratings or distances from tube or railway stations and simply setting out the broad criteria, such as being well-connected to jobs, services and public transport. The supporting text could helpfully set out the kinds of factors the Council will consider in making its judgements, without creating unnecessary and unhelpful constraints.

Policy H5 – Supported and Specialist Housing

133. In my view, the operational aspects of any supported or specialist housing proposals are outside the scope of the Plan. Moreover, I see no way how the necessary levels of supervision, care or support services could be assessed as part of any application or how they be appropriately controlled through the planning system. As such, criteria 2e and 2f are neither justified nor effective and should be deleted.
134. Criterion 3 should be modified to ensure clarity with regard to accessibility features. For example, is the intention to meet the expectations of Policy DE13 or criterion 6 of this policy or something different? Modifications should be made to provide clarity in this regard.
135. I see no justification for criterion 5 requiring the re-provision of residential development where the loss of supported and specialist accommodation has been found acceptable, even if qualified as suggested in the Council's Matter 12 hearing statement. This criterion should also be deleted.
136. Criterion 7 is unnecessary given it simply refers to criterion 4. More logically, criterion 4 should be modified to include reference to the situations where there would be complete or partial loss of specialist accommodation.
137. To reflect what is set out in the supporting text to London Plan Policy H13, it would be appropriate to include reference to the consideration of dementia. In this regard, paragraph 4.13.13 of the London Plan acknowledges that there is no clear evidence of the best method of provision and that solutions will continue to develop. As such, providing detailed policy requirements would be difficult. Nevertheless, reference to this would ensure consistency and allow this factor to be considered in relation to at least criterion 2d.

Policy H6 – Community-led housing

138. The supporting text to Policy H6 refers to self-build and custom-build housing. However, the policy itself refers to neither. Modifications are therefore needed to address this omission, as suggested in the Council's Matter 12 hearing statement. The policy should ensure that the approach to community-led and self/custom-build housing is clearly differentiated where necessary. It would also ensure effectiveness if the supporting text clearly set out how the different types of housing were defined and any controls that would be imposed on occupation. The Council should also establish the principle of using planning obligations to secure development as self- and custom- build housing within the policy to provide certainty (as per Policy H7 on Build to Rent, for example).
139. Further to this, the policy requires a local need to be "clearly" demonstrated for the types of housing covered by the policy. However, it remains unclear why this would be necessary in all cases, particularly in locations where any form of residential development would already be acceptable in principle. On this basis, criterion 1a is not justified and should either be deleted or modified such that the circumstances in which demonstration of a local need would be necessary are set out. As elsewhere,

where affordable housing is being required there should be a cross-reference to Policy H2 for clarity.

Policy H10 – Traveller Accommodation

140. As submitted, the policy identifies a requirement for at least 21 pitches over the plan period. Updated evidence suggested that the need should be for at least 30 pitches and 1 transit site. The requirement should be updated to reflect this evidence.
141. This Plan does not seek to meet these needs. As such, there is a legitimate question as to whether it is positively prepared in terms of meeting the needs of Gypsies and Travellers. The Council is however preparing a separate Traveller Local Plan (TLP) to address this issue. I have concluded that a separate plan may be acceptable in this instance as I have seen substantial evidence that the TLP is being progressed. My understanding is that this will be submitted for examination shortly. In any event, this needs to be submitted before the end of 2026 or before the submission of my final Report, whichever is sooner. If not, then I may need to reconsider the issue. The Council should therefore keep me informed of progress on this plan such that I can remain content that the issue is being dealt with.
142. Document O4 commits the Council to draft modifications to Policy H10 to ensure consistency with the national Planning Policy for Traveller Sites (PPTS) document. In drafting this, please note that criterion 3 is a statement of intent that has no bearing on decision making or the preparation of the separate plan. As such, this should be deleted from the policy. As part of this exercise, the Council should also ensure that Policy H10 is adequate to guide the allocation of sites and/or clarify whether the criteria set out in criterion 2 also apply to the suitability of allocations.

Homes in Multiple Occupation

143. As submitted, the Plan does not contain a specific policy to address the issue of Homes in Multiple Occupation (HMOs). Other housing policies are unlikely to be sufficient to consider the specific issues that might arise from such proposals. On that basis, the Plan would not be effective in dealing with what may be a substantial number of planning applications. Accordingly, modifications are necessary to plug this gap.
144. The Council submitted a potential policy for this within document E9.1. Following discussions at the last hearing sessions, further modifications are necessary to ensure soundness. Firstly, the policy should be modified to apply to any development involving the provision of HMOs, not just conversions or changes of use.
145. The policy seeks to deliver high quality accommodation but relies on minimum space standards only for this. There are other factors, such as outlook or light that can also influence this. Given what criterion 1 already covers it would be appropriate for this to be modified to address other relevant matters to ensure effectiveness.
146. While criterion 2 may form part of an existing policy, I am not persuaded it is effective. Firstly, the policy is to ensure development does not harm the residential character of the area or result in an excessive number or clustering of conversions. Whether or not this is the case seems to rely only on whether 20% or more of any street or road is within HMO use. Notwithstanding that a “street or road” is an ambiguous measure, the 20% figure does not properly address the separate issue of clustering.

147. The Council should therefore draft modifications which address this issue. This could be by reference to existing development plan policies, including the Hadley Wood Neighbourhood Plan. However, the Council could also consider whether a qualitative approach would be equally effective. Not all such matters necessarily need to be assessed against a threshold and if the policy or supporting text were to set out what factors they would consider in determining 'harm' from clustering of properties, which could still include the number or proportion of HMOs in close proximity, then this would also be acceptable.
148. Amendments should also be made to the suggested policy to remove any ambiguity caused by reference to "streets or roads". A more precise and comparable measure should be identified. Again, I note the Hadley Wood Neighbourhood Plan uses a different approach to the existing local plan policy and this may be something the Council would wish to consider.
149. Criterion 3 does not cover the full range of potential effects from development. Again, while such matters as overlooking may be covered elsewhere, their omission from this policy, where noise and disturbance are included, may cause some ambiguity. This should be addressed.
150. Criterion 4 should be amended to clarify what is meant by 'appropriate' parking arrangements through cross-reference to the London Plan parking standards.

Sustainable Enfield

Policy SE1 – Responding to the Climate Change Emergency

151. While Policy SE1 is laudable in setting out how the Council intends to respond to the climate change emergency, it is largely made up of statements of intent that serve little to no purpose in terms of decision making. They often also simply relate to other policies which set out the substantive decision making elements. As such, the outcomes of what the policy seeks to achieve are set out elsewhere in a more useful and effective manner. There is no particular need for a 'strategic' policy to set the context for subsequent policies. Therefore, notwithstanding the actions set out in document O4, the Council should either modify Policy SE1 such that it serves a clear purpose or delete the policy, with the statements of intent incorporated as supporting text where necessary to do so.

Policy SE2 – Sustainable Design and Construction

152. Criterion 1 establishes the requirement for sustainable design and construction statements for all development. However, other than setting out what the document should contain, the only expectation is that it should demonstrate that the relevant policy requirements are met (albeit it does not state which are the relevant policy requirements). Given these statements form part of the Council's validation requirements it is not necessary to refer to them in policy. It should also not be necessary to set out in policy that applicants must provide evidence to demonstrate that they have met the policy requirements (logically, if they do not then it would be reasonable to assume permission would not be granted). Criterion 1 should therefore be deleted, with any explanation of how sustainable construction statements can be submitted and what they should include set out in supporting text.
153. Criterion 2 refers to major development meeting Home Quality Mark (HQM) standards. However, paragraph 4.7 states that where alternative assessment frameworks have been approved by the local authority, developments may have the

option to utilise them. This would be giving policy status to things outside the scope of the Plan and thus this should be deleted. Paragraph 4.8 goes on to state that the requirements of Policies SE3, SE4 and SE5 can inform and, if necessary, take precedence over the HQM standards. This paragraph creates an obvious ambiguity in terms of if, or when, the HQM standard should be required.

154. The Council has indicated that it has referred to this standard in its current plan, but this is not justification in itself, particularly when this predates various Written Ministerial Statements on standards and energy efficiency in particular. In addition, I have received little information explaining what meeting the HQM entails or why adherence is necessary. Overall, I am not persuaded by the limited evidence that the requirement is justified or effective and thus it should be deleted from both policy and supporting text.
155. Document E6.1 suggests a modification to Policy SE2 to refer to water efficiency standards. However, as far as I can tell, this only repeats what is in the London Plan Policy SI5. While not necessary to repeat London Plan policy, given the amount of duplication that already exists between the Plans the omission of this element may result in some ambiguity. Therefore, for completeness, it would be prudent for one of the policies in this chapter to set out the requirements for water efficiency, though these should be consistent with the London Plan and a cross-reference may suffice.

Policy SE3 - Whole-life carbon and the circular economy

156. In some respects, the policy defers to London Plan Policy SI7. I note in respect of Circular Energy Statements, the London Plan policy refers to more than carbon emissions or embodied carbon. It also refers to opportunities for managing waste, waste storage and collection and the waste hierarchy. London Plan Policy SI8 also refers to the circular economy in relation to waste. For consistency and effectiveness, the Council should ensure that either this policy, or those relating to design of residential and commercial development, provide adequate guidance and/or cross-reference to the London Plan on matters of waste, where these would fall outside the scope of the relevant Waste Local Plan.

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

157. The policy is unduly complex, with several different thresholds for different requirements. There are also several different standards, which makes the policy difficult to follow and use. Taken together it is not a clear and effective policy. As well as what is set out in document O4, the Council should rationalise and simplify the policy such that it simply and clearly sets out what is necessary for different scales of development.
158. The revised policy should simply set out the energy use intensity standards and space heating demand that will be applied, including how situations would be considered where these would not be feasible would be assessed, the approach to offsetting (in that this would be a last resort), and how the Council will address the issue of decentralised energy connections. This should also set out how technical feasibility and/or economic viability would be taken into account. As well as taking account of the actions in document O4, this should also helpfully include a definition of decentralised energy network in the supporting text.

Policy SE5 – Renewable Energy Development

159. As drafted, Policy SE5 sets out what issues will be considered, but does not provide any clear guidance on when a development would be found acceptable or not. It is

also unclear as to whether the delivery of renewable energy is seen as overriding existing policies on such things as heritage or living conditions. At present, criterion d. reads as if mitigation for any harmful impacts is merely a 'consideration' rather than a necessity. Criterion d. should therefore be modified to make it clear that if suitable mitigation cannot be provided then development will not be acceptable.

Policy SE9 – Sustainable Drainage Systems

160. As the Council acknowledged in its Matter 8 hearing statement, there are elements of this policy that are not consistent with national policy, the PPG or the London Plan. The policy should therefore be modified to better reflect these documents, including providing clarity with regard to situations where Sustainable Drainage Systems (SuDs) are either not necessary or not practical. Consistency is also needed in terms of greenfield runoff rates. The Council should reconsider its suggested modification in document E6.1 to criterion 3.
161. Criterion 10 is process related only and the provision of a SuDs strategy should be part of the Council's validation requirements. Accordingly, this should be deleted from the policy, with reference made in supporting text if necessary. Similarly, criterion 11 is about process and not outcome. This should also be deleted, with any necessary advice for applicants placed in the supporting text.
162. I am not persuaded that the Council's suggested criterion relating to drainage to the foul sewer is necessary for the Plan to be sound. As such, this should be removed from the MM schedule.

Addressing Equality and Improving Health and Wellbeing

Policy SC2 – Protecting and enhancing social and community infrastructure

163. Further to the actions set out in document O4, and to ensure internal consistency, any review of this policy should include its scope. This is particularly the case where the policy concerns the loss of community facilities which may be covered by other policies (see CL1-CL5). In this regard, ensuring paragraph 5.7 is clear about what the policy and criterion 1 refers to is important.
164. For the sake of clarity, other than in relation to criterion 4, modifications suggested to SC2 set out in document E6.1 are not necessary for the Plan to be sound and should be removed from the MM schedule.

Blue and Green Enfield

Policy BG1 – Blue and Green Infrastructure Network

165. For the avoidance of doubt, as set out in the Council's Matter 10 hearing statement, the suggested modifications set out in E6.1 are *not* necessary for the Plan to be sound and should be removed from the schedule.

Policy BG4 – Biodiversity Net Gain, Landscape Restoration and Offsetting

166. Policy BG4 seeks to set a minimum requirement of 20% BNG. Paragraph 74-006-20240214 of the PPG states that plan-makers should not seek a higher percentage than the statutory objective of 10% BNG and that to justify any higher figure there must be evidence of a local need.
167. The Council has variously argued that the local need comes from the degraded landscapes in Enfield and the Enfield Chase Landscape Recovery Project, the need to manage SINCs, and the extent of Green Belt release. I am not persuaded that these factors, which are not necessarily unique to Enfield or unusual in nature, are

sufficient to justify departure from the statutory requirements. This is not least because BNG would be provided on-site in many situations. As such, in many cases, the mitigation would not have any effect on these Borough-wide factors. Even where BNG is directed to local nature recovery strategies, this is accounted for by the statutory minimum and would still associated provide benefits. It does not provide a justification for seeking a figure above the minimum.

168. In addition, the Green Belt is not a biodiversity designation and thus I cannot see how the scale of Green Belt release would justify going beyond 10%. Any potential harm caused to biodiversity in the Green Belt would still need to be assessed in the normal way and statutory requirements would still be in place to require appropriate mitigation and enhancement. BNG in and of itself should not be seen as a compensatory measure for Green Belt release.
169. The Blue and Green Strategy and Addendum (FLD2 and FLD3), which the Council pointed to as evidence for a higher requirement, also only appear to refer to the 10% minimum BNG figure. As such, these documents have been prepared with the statutory minimum in mind and thus do not provide any justification for going beyond it.
170. Notwithstanding the viability evidence, the Council should modify Policy BG4 and relevant supporting text, and any other policy requiring more than 10% BNG, to ensure consistency with the statutory requirements and the PPG. This is in addition to the required modifications to this policy set out elsewhere.

Design and Character

Policy DE3 – Inclusive Design

171. Criterion 1 should be modified to remove reference to applications being refused. This is not justified. The language should also be modified to reflect that in London Plan Policy D5. Criterion 2b is also about process and not outcome. I do not see how this criterion serves a decision making purpose. As such, it should either be deleted or modified to be clear what concern the Council is hoping to address through engagement. Criterion 2f. is merely repeating the requirements of building regulations and thus should also be deleted.

Policy DE4 – Putting Heritage at the centre of place making

172. Policy DE4 effectively only lists things the Council intends to do in relation to heritage. Criteria 1 and 3 in particular refer to activities outside the scope of the development plan. Criterion 4 is, as acknowledged, repeated in Policy DE10. Criterion 2 refers to matters which may form part of decision-making in some cases, but they are listed under the auspices of what the Council will seek to do with stakeholders. I am satisfied that Policy DE10 will be adequate to assess issues relating to heritage. Thus, I am not persuaded that Policy DE4 serves any purpose and should therefore be deleted. The Council may wish to set out intentions toward heritage within the supporting text, but as submitted this is not a soundly based policy.

Policy DE5 – Strategic and Important Local Views

173. Further to actions agreed elsewhere, it is not realistic to expect development within important views to result in *no* harm or obstruction. To that end, the policy should be modified to make it clear that it should not lead to unacceptable harm.

174. The supporting text should also be modified to explain how allocations, where relevant, will be considered in the context of this policy. For example, where the Council has already considered and accepted changes to strategic views as part of the site selection process then this should be made clear. This is not to say that allocations should not have regard to views, or not seek to minimise their impacts, but rather the extent to which the views have already been considered should be explained. To that end, policies for allocations which may affect the views listed should also be modified, where necessary, to make it clear how strategic or local views will be assessed and what mitigations will be needed.

Policy DE6 – Tall Buildings

175. Further to the actions set out in document O4, and remaining relevant suggested modifications in document E6.1, criterion 8 should be modified to make it clear what other aspects of this policy may be relevant. This is on the basis that, at least from any effect on character and appearance, there are likely to be more factors than just the impact on the skyline that are important, including for example effects on heritage assets.
176. With regard to Enfield Town Centre, I am not persuaded that the evidence justifies the appropriate heights proposed, particularly for Palace Gardens. The Council acknowledged that Appendix D does not carry forward the recommendations of the Character of Growth Study (CoGS) for this area. While the Council sought to add additional mitigation measures into the policy text for the town centre, it is nevertheless the case that there was no re-assessment of the likely effects of building at this height and whether the mitigation would be likely to be effective. The approach taken also appears to be inconsistent with how the findings of the study have been carried forward elsewhere.
177. To that end, Appendix D should be modified to reflect 'Revision B' in the CoGS for Enfield Town Centre. In addition, modifications are needed to Appendix D to ensure consistency with the modified policy. This includes removing any indication that the plan is automatically supportive of buildings taller than what is stipulated, including, but not limited to, Enfield Town Centre. This would be at odds with the policy.

Policy DE9 – Shopfronts and Advertisements

178. On further reflection, I see no reason why this policy should exclude ground floor frontages or shopfronts outside of Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) areas. While such shopfronts may not be common in these areas, there seems no obvious reason for the distinction. Modifications to the policy and supporting text are therefore necessary, as suggested in paragraph 47 of the Council's Matter 11 hearing statement.

Policy DE11 – Landscape Design

179. Further modifications are needed to criterion 3 to qualify any expectation that "all" development will be required to deliver comprehensive hard and soft landscaping schemes. This is unlikely to be justifiable or achievable in some cases. It will not always be possible for schemes to link to the wider blue-green infrastructure network or necessary to provide sustainable drainage systems. Elements of criterion 3 would also benefit from cross references to other relevant policies, as suggested in the Council's Matter 11 hearing statement.

Policy DE13 – Housing Standards and Design

180. Criterion 1d should be modified to remove reference to ‘exceeding’ minimum internal space standards. This could wrongly suggest that the Council would resist applications which meet the standards. It is legitimate for the supporting text to explain that the Council would encourage applicants to exceed this where possible. Similarly, references to the range of different documents and standards mentioned in criterion 1e should be removed. The policy is to ensure development provides well-designed, flexible and functional layouts. Reference to various different documents, which may not always be relevant, or consistent with each other, is unhelpful. Again, providing examples of how this could be achieved in supporting text may be helpful, but is not effective in the policy itself.

Policy DE14 – External Amenity Standards

181. Paragraph 7.111 suggests that the minimum standards will not always be acceptable and that there are situations where more amenity space would be expected. This includes situations where an area is deficient in play areas. This differs to what is set out in criterion 5, which I have asked to be deleted in any event. There may be occasions where meeting the *quantitative* requirement will not necessarily lead to an acceptable proposal overall, perhaps because of layout, the effect on local character, quality of the space or effect on neighbouring properties. However, this does not tally with the circumstances referred to in 7.111 or the suggestion that the Council may ask for more amenity space even where standards are met. This is not justifiable. The paragraph also refers to deficiencies in play space, which are outside the scope of this policy and should be addressed under Policy CL5. Accordingly, paragraph 7.111 is not justified or effective and should be deleted.

Economy

Policy E1 – Employment Land and Growth

182. For the avoidance of doubt, the Council should draft modifications to this policy to ensure Table 9.1 properly reflects the changes set out in previous actions and this letter. Further, the additional criteria suggested in document E6.1 are *not* necessary for the Plan to be sound. Once land has been identified on the Policies Map as SIL, there is no need for the Plan to explain this in policy. The Council may, however, wish to add something to the supporting text to explain how the Plan has altered SIL for completeness. It is also unnecessary to delete paragraph 9.21, though this will need to be modified to reflect other changes to the Plan.

Policy E2 – Promoting Jobs and Inclusive Business Growth

183. Further to the actions set out elsewhere, criterion 1 is a statement of intent, rather than a decision making tool. Accordingly, it serves no particular purpose and should be deleted. Again, the Council may decide to amend the supporting text to include this reference but it should not be in the policy.

Policy E4 – Supporting Offices

184. Criterion 2 of Policy E4 suggests that proposals which result in the loss of office space should “maximise the re-provision of office floorspace as part of any redevelopment scheme”. This is a somewhat ambiguous requirement, both in terms of whether re-provision is an absolute requirement or how it would be determined whether re-provision would be ‘maximised’. More importantly, I am not persuaded

that expecting re-provision can be justified when applicants must have already demonstrated that there is no current or future market demand for the site for offices. It would be unreasonable to suggest that applicants should re-provide office floorspace on a site where there is no demonstrable demand for that use.

185. The final sentence of criterion 2 should therefore be deleted, with consequential changes to supporting text. Clearly, if the Council were to modify the policy to *encourage* the re-provision of offices, then that would be reasonable.
186. While a period of 24 months marketing might be considered appropriate for offices, there may be other justifiable mechanisms by which an applicant could demonstrate there is no reasonable prospect of the site being used for offices in the foreseeable future. This might include, for example, strategic and local assessments of demand, evidence demonstrating a site or premises is no longer fit for purpose or where it might be self-evident that a site is no longer in a suitable location for office use. In such cases, relying on quite a long period of marketing alone might be both unjustified and ineffective. Criterion 2 and/or supporting text should therefore be modified to allow consideration of other factors as well as marketing information alone.

Policy E5 – Transforming Industrial Sites

187. As well as agreed actions to criteria 1 and 2, criterion 3 refers to general matters relating to development in SIL and LSIS designations that are not specific to intensification. This is an example of where unnecessary repetition with other, more relevant, policies could result in a degree of confusion or ambiguity. Criterion 3 should therefore be deleted or a cross-reference provided to other relevant policies.

Policy E7 – Non-designated Industrial Sites

188. On further reflection, further modifications to this policy are needed to those set out in document O4. It continues to be necessary for the policy and/or supporting text to set out how application for new 'industrial type' uses in non-designated areas will be assessed.
189. However, how the policy deals with the 'loss' of such uses needs further consideration to ensure the policy is effective. It is logical to consider whether there is no reasonable prospect of the site being used for industrial and related purposes. In the context of non-designated areas, I consider 24 months of marketing to be excessive and not justified (these areas are not considered as important as SIL or LSIS locations and the office market in Enfield appears more fragile and thus more care may be needed over potential loss of existing floorspace). Moreover, as with offices, there may be other evidence which could be used to determine this, including strategic and local assessments of demand (as set out in paragraph 6.7.5 of the London Plan). Paragraph 9.45 also highlights the fact that not all non-designated industrial sites are ideally located. This may often be self-evident and should not require long marketing periods to confirm. Where this is the case, and it is clear the site is not suitable for industrial uses, the need for marketing may constitute an unnecessary delay to alternative beneficial development.
190. The policy should therefore be redrafted to make it clear that the policy is to ensure there is no reasonable prospect of the site being used for industrial-type uses and that there may be various ways in which this could be demonstrated, including a period of marketing. Examples of the information that could be used to demonstrate

this should be placed in supporting text, including what the Council suggests as a suitable period of marketing.

191. There is no justification for criterion 2b, which requires applicants to seek to make reasonable efforts to secure alternative sites. This should be deleted. However, criterion 2c is a logical element of the policy that should remain.

Policy E8 – Providing for workspaces

192. The Council has indicated that there is no intention to prohibit development that falls outside criterion 1. This criterion is again seen as a ‘positive material consideration’ rather than limitation. However, this provides no clear guidance to decision makers on where other forms of ‘workspace’ would be acceptable outside the provisions of criterion 1. This is unhelpful. It also provides no clarity on where ‘workspaces’ would *not* be supported. Much of this should already be covered by other policies on SIL, LSIS, offices, defined centres and, once modified, Policy E7. There is clearly nothing wrong with policies encouraging what is set out in criterion 1 but I do not think that this is how criterion 1 would be interpreted. The Council should draft modifications which either ensure it is seen as an encouragement over and above what is set out in other policies or deleted.
193. Further to this, modifications are necessary to include the relevant thresholds and requirements for affordable workspace set out in paragraph 9.49 in the policy.

Policy E9 – Local jobs, skills and local procurement

194. Further to document O4 I am not persuaded that the provisions of paragraph 9.56 are justified, in particular the expectation that developers should source at least 10% of the total value of goods, services and supplies from local businesses. Even if the Council is only expecting ‘reasonable endeavours’ in these regards, I cannot see any justification for a planning policy seeking to control where goods and services are procured or how this relates to mitigating the effects of development. Similarly, I consider the requirements of paragraphs 9.63 and 9.64 are overly prescriptive and not justified.
195. The Council pointed me to both the London Plan and Barnet Local Plan (2025) as justification for this policy. However, as far as I can tell, neither plan sets out such detailed or prescriptive requirements. Rather they establish the broad principle of supporting learning and skills and the securing of apprenticeships, which is not in question. These provide no basis for the detailed requirements set out in the supporting text. Modifications should therefore be drafted for my consideration which remove these detailed requirements.

Policy E12 – Meridian Hinterlands

196. As discussed at the hearing sessions, I found Policy E12 to be somewhat confusing, both in terms of its purpose and implementation. In its Matter 13 hearing statement, the Council suggested deleting the policy and subsuming any necessary elements within a revised Policy PL5. This was partially due to the Council’s desire to reconsider its approach to parcels C and D of the Meridian Water area. The position on these parcels has moved on because of work on this on-going development project.
197. Notwithstanding this change in situation, I would question the need for Policy E12 in any event. It seems primarily to be concerned with justifying or explaining a change in current policy, rather than acting as a decision making tool. In my view, providing

that the end result complies with London Plan Policy E7 then there is no need for Policy E12 and thus I am content that it be deleted.

198. Given the fluidity and complexity of the on-going Meridian Water scheme, it would be appropriate for the policies to reflect the most up-to-date position to ensure effectiveness. Accordingly, the Council should draft modifications which delete Policy E12, update Policy PL5 and/or associated 'SA' allocations, to reflect the position set out in the Matter 13 hearing statement and subsequent note. This should include any changes to the land use mix and capacities, as discussed, as well as incorporating any necessary land use or design requirements from the supporting text to Policy E12 into the revised Policy PL5. These modifications should ensure that the updated approach to Meridian Water and SIL remains compliant with the London Plan.

Town Centres and High Streets

Policy TC1 – Promoting Town Centres

199. The Council should draft potential modifications which make it clear that Primary Shopping Areas are analogous to town centre boundaries, as set out in its hearing statement. This will ensure consistency with national policy and effectiveness.

Policy TC2 – Encouraging vibrant and resilient town centres

200. Where it is within the Council's gift, criteria 1b and 1c create a moratorium on any change of use to residential on the ground floor. The reason for this is ostensibly to protect the vitality and viability of centres. However, I am concerned that such restrictions, without any assessment of *actual* harm, are not justified or effective. Accordingly, the Council should draft modifications indicating that such uses would be refused unless it can be demonstrated that there would be no unacceptable harm to the vitality, viability or character of the centre.
201. Further to this, there is a potential inconsistency between Policies TC2 and TC6. Policy TC2 allows for commercial, business and service activities, as well as main town centre uses. Policy TC6 places certain restrictions on these where they relate to hot food takeaways, betting shops, pawnbrokers, payday loan shops and amusement centres and casinos. These may fall within the uses Policy TC2 considers to be acceptable in principle. To ensure there is no potential for ambiguity, criteria 2 and 3 of Policy TC2 should be modified to include a cross-reference to Policy TC6. As suggested in the Council's hearing statement, criterion 2 should also be modified such that it does not imply that *all* development is expected to meet its requirements.
202. For clarity, the modification suggested to criterion 2 in paragraph 12 of the Council's Matter 14 hearing statement should also be made.

Policy TC6 – Managing the clustering of town centres

203. Further to the actions in document O4, it cannot be justifiable to require the submission of a Cumulative Impact Assessment for every application referred to in paragraph 10.26. While such a document might be one mechanism to demonstrate there would be no unacceptable impacts, there may also be others or, in some cases, it may be self-evident to a decision maker whether there are likely to be issues without the need to submit additional information. Criterion 3 should therefore be deleted and supporting text modified to make it clear what issues the Council will have regard to and that a Cumulative Impact Assessment may be

requested where proposals are within areas of high concentrations of such uses or where existing problems have been identified.

204. In addition, paragraph 10.29 refers to limitations on the siting of hot food takeaways in the London Plan. As the Council has decided to include a policy of its own on this issue, it is important to ensure a degree of consistency, especially as the London Plan policy is referred to. As submitted, Policy TC6 only directs hot food takeaways to designated centres. If there are any designated centres within 400 metres of a school entrance, then the allowance of such uses within centres could cause an unintended conflict. Accordingly, the policy should be modified to include, or cross refer to, the restrictions set out in the London Plan.

Movement and Connectivity

General Matters

205. From the modifications I have already identified, and those set out below, it is clear that there is a significant amount of duplication between policies in this chapter. Further to the specific requirements set out below, I would also ask the Council to review these policies and put any further rationalisation to me for my consideration. As noted elsewhere, it cannot be an effective approach to have multiple policies in the same chapter dealing with similar issues in different ways. Considering these matters through different 'lenses' in this case has simply resulted in the potential for unnecessary ambiguity.

Policy T2 – A Healthy and Connected Enfield

206. On further reflection, criterion 3a of this policy should be modified to reflect London Plan Policy TB6. This could retain reference to encouraging development to be designed to provide the minimum parking necessary and not exceed London Plan parking standards.
207. There is no justification for a borough-wide moratorium on vehicle crossovers as suggested by criterion 4d. The Council suggested some modifications in document E9.1 that would allow the effects of any proposal to be assessed. However, to be justified and effective, further amendments to this are needed to make it clear that criteria a-g would apply wherever planning permission is necessary. The policy should not be read to include a 'presumption against' crossovers in any situation. In addition, while cumulative effects are clearly a legitimate concern, the policy should not suggest there are other factors outside criteria a-g that would be relevant considerations. The Council should ensure that the policy includes everything that is likely to be taken into account.
208. Amendments are also needed to criterion 5 to better reflect London Plan Policy T6 in terms of what is expected with on-street electric vehicle charging points. Supporting text should make it clear that this criterion is not seeking to replicate or exceed Building Regulations.

Policy T3 – A Vibrant and Safe Enfield for Everyone

209. Criterion 1 effectively duplicates what is in Policy T2 in terms of parking standards but refers to the issues slightly differently which may create a degree of confusion. This should be deleted with any important elements combined with the other policy. It is also unclear what criterion 2 adds which is not adequately covered by policies on walking and cycling under Policy T1. Again, it would be sensible to incorporate these similar expectations under one policy to reduce the opportunity for confusion.

Thus criterion 2 should be deleted with any specific 'active travel' elements not covered elsewhere combined into Policies T1 or T2. Similarly, the criteria in Policy T3(6) which deal with active travel and road safety seem to be adequately addressed by both Policies T1 and T2. Criterion 6 should therefore be deleted with any outstanding requirements set out in relevant parts of those policies.

210. Criterion 4 is ambiguous in relation to what is meant by larger developments and what key local services are. The Council has suggested a modification to refer to 'strategic allocations'. However, relevant allocations policies should already identify what key service provision is required and thus this criterion would be unnecessary. Moreover, other policies already set out the circumstances in which planning obligations would require the provision of on-site or off-site services or facilities. I am not persuaded that this criterion is necessary and thus it should be deleted. If the concern is that development should not lead to a reliance on the car then this could be set out in the various other criteria in Policies T1-T3 that deal with sustainable patterns of development.
211. Criterion 5 deals with the effects on the road network. This should be modified as suggested in the Council's Matter 17 hearing statement to better reflect national policy. As per my comments above, it may however be that this element could be incorporated within other parts of Policies T1 or T2 which deal with similar issues (not least as this criterion is not specifically related to safety, but rather the efficiency of the transport network). Criterion 3 should be modified as suggested in the Council's hearing statement.
212. For the avoidance of doubt, I am content that the suggested modification to 'part 3' and the supporting text relating to personal safety, as set out in document E6.1, is necessary for soundness and should be included.

Culture, Leisure and Tourism Policies

General Matters

213. The actions for these policies already recognise there is a significant amount of overlap and potential for internal inconsistency between these policies, and policies elsewhere in the Plan. To this end, I have already indicated that Policy CL4 be deleted with any *necessary* unique elements moved to other relevant policies. For the sake of clarity, the Council must ensure that the scope of each policy is clear and there is no unnecessary duplication between policies (for example, where both Policies CL2 and CL3 refer to the location of visitor accommodation, but do so differently, which is clearly ineffective). To that end, if in addressing my concerns the Council were to suggest the combining of policies to address potential inconsistencies then I would be open to considering this option.
214. Further to the above, there is the need to ensure that there is internal consistency and clarity with regard to how the 'loss' of facilities will be assessed (for example, both Policies CL1 and CL6 refer to loss of pubs but do so inconsistently). Modifications may therefore be needed to Policies CL1, CL2, CL3, CL5 and CL6 to ensure the scope of each policy is clear, to ensure internal consistency in approach and to ensure consistency with relevant parts of the NPPF.

Policy CL5 – Sport, Open Space and Recreation

215. As submitted, this policy is unclear with regard to what standards are expected to be achieved, with several criteria referring to the amount of provision to be made and different thresholds for delivery. Modifications are therefore needed to clearly

establish the thresholds that are relevant to delivery and both the quantity and quality standards that are expected to be used. The policy also needs to be clear about where provision will be expected to take place and the circumstances in which off-site provision will be acceptable.

216. This should be set out in a way where an applicant or decision maker can simply see what is expected for a particular scale of development. This may also lead to a rationalisation of the policy and reduction in duplication and overlap, such that it would also improve effectiveness. The Council should review the number of different documents and quality standards it refers to in this policy and delete or move to supporting text those which are not imperative to the implementation of the policy.
217. With regard to criterion 2, the tests should apply to all forms of open space, not just sports and recreational buildings and land. It should also be noted that paragraph 103 of the NPPF states that existing open space “should not be built on” unless the relevant tests are met. The criterion should be modified to reflect this.
218. With regard to standards, I am content for Table 12.1 to be updated as per the recently published Playing Pitch Strategy’s recommendations. This will ensure the standards are justified. For the avoidance of doubt, the policy or supporting text should be modified to make it clear that the different requirements are mutually exclusive.
219. In terms of criterion 8, it is not clear why only major development should be subject to the requirement for 10 metres of play space per child. This also appears to be at odds with London Plan Policy S4 which requires children’s play space for all residential development. No reason has been given for divergence from the London Plan and thus, if the Council wish to maintain a ‘local version’ of this policy then it should be modified to be consistent with Policy S4.
220. Further to this, I am not persuaded that it is justified to expect open space provision from commercial development. It is unclear how such development would generate a need for open space or playing pitches. The policy should therefore be modified to make it clear that provision is for residential development only. Criterion 12 should also be modified to allow the effects of natural pitches on living conditions to be assessed and to remove any limitation on ‘light spill’ being a consideration in the Green Belt or MOL only. In terms of light spill, the policy should establish what harm the policy is seeking to avoid. References to ‘very special circumstances’ in this criterion are not an accurate representation of national policy and should be deleted. Finally, the policy should also be modified to include reference to how new open spaces will be expected to be managed.

Policy CL6 – Protecting and Attracting Public Houses

221. In addition to changes proposed in E6.1 and O4, criterion 2 should also be modified to include reference to redevelopment, or any other way in which a pub might be ‘lost’, as well as change of use. This will ensure effectiveness.

Environmental Protection

Policy ENV1 – Local Environmental Protection

222. Further to the actions already agreed for criterion 1, criterion 1b should be modified to remove reference to ‘major’ development where air quality assessments may be needed. The ‘should’ in criterion 1c needs to be amended to “must” to be consistent

with national policy. The policy should also be modified as per paragraph 3 of the Council's Matter 18 hearing statement to refer to preventing or minimising exposure to existing poor air quality and development not individually or cumulatively creating new areas of pollution. This will ensure effectiveness.

223. Criterion 2 should be modified as suggested in paragraph 8 of the Council's Matter 18 hearing statement. Criterion 2b appears superfluous when read with 2a, in that development that has the potential to generate noise already "must demonstrate" that it would not have an unacceptable effect. One would assume that one way of doing this would be through submission of a noise assessment. The potential for this could be set out in the supporting text. This criterion should therefore be deleted to aid effectiveness.

Delivery and Monitoring

General Issues

224. For the avoidance of doubt, I do not consider the suggested policy on Water and Wastewater, as set out in document E6.1 is necessary to make the plan sound. This should therefore be removed from the schedule. Matters relating to infrastructure provision and/or effects on living conditions are adequately addressed through other policies.

Other Allocations – General Issues

225. The majority of issues with individual allocations have been picked up through existing actions. In the main, these relate to ensuring a clear and consistent approach. As noted above, if in drafting modifications to meet existing actions the Council identifies any further or resulting inconsistency then modifications should be drafted to address this.
226. Document E9.1 records the discussions that were had about the effectiveness of the tables in Appendix C that include information such as which flood zone the site is in, its PTAL rating, heritage constraints and any archaeological features. Some sites also include different factors, including relevant 'viewpoints'. Though not set out in the traditional way, I consider this information to effectively be 'supporting text' for each allocation. As such, some this is of use to applicants and decision makers.
227. However, the use of a red, amber or green (RAG) rating' for some of these 'site considerations' is not helpful. It is not clear, for example, how a decision maker should take account of amber or red scores and these may cause a deal of confusion. Accordingly, these elements are not effective, and modifications should be drafted to remove the RAG ratings from each allocation.
228. The PTAL ratings of each site can be important factors. Transport for London (TfL) have updated the scores during the examination and thus what is included may be out-of-date. Modifications are necessary to ensure the policies are as up-to-date as possible. Text should also be added to the introduction to Appendix C which explains that these are accurate at the time of adoption but are subject to change and that applicants should check the latest information.
229. As discussed at the hearing sessions, policies should make it clear whether development would either be expected to be car-free or car-lite and make reference to London Plan parking standards. The policies also need to be clear, consistent and accurate with regard to any transport measures needed. The Council has

suggested several potential modifications already, which I am content are necessary to ensure the Plan is effective. However, there is no need for references to be made to engaging with TfL. This is a procedural matter and does not need to form part of policy.

230. For the avoidance of doubt, the land use requirements descriptions must include the scale of development proposed in all relevant cases. At present, there is an inconsistent approach to this across allocations, where in some cases it is not clear what is expected. Where housing or employment land figures are set out, these should also be identified as a *minimum*, unless there is a clear reason why capacity is constrained. In those circumstances the language should either be “up to” or “approximately”. There is no reason why, subject to meeting other policy requirements, delivery on sites should be unnecessarily constrained.
231. Any references to potential effects on heritage should be consistent with national policy in terms of how development will be assessed. This may be best addressed through a cross-reference to relevant criteria policy.
232. Again, for the avoidance of doubt, it also needs to be made clear what the status of the inset maps is for the determination of any application. It should be made clear either through text on each map and/or introductory text that the maps are illustrative only.
233. The Council has identified a number of allocations that have now been fully implemented, including SA1.6, SA7.3, SA7.5, URB.04, URB.05, URB.06, URB.31 and URB.35. My assumption is that this information is accurate. Retaining these allocations serves no particular purpose and thus the Council should draft modifications to delete these, and any other fully completed sites, from the Plan. This does not apply to those sites that either are under construction or have full permissions where there is scope to utilise the policy at some point. For clarity, URB.34 should be deleted as an individual allocation because, as I understand it, the reason for allocation was effectively to change its status to LSIS. An allocation for this is unnecessary. A change is necessary to the Policies Map to identify this site as LSIS.

URB.01 – Brimsdown Sports Ground

234. The capacity of the site should be updated to reflect the most recent and accurate position. There is no justification for any of the other modifications suggested by the Council in document E9.1. The allocation, including provision of open space, is sound in principle and any loss of open space would need to be considered in the normal way. As the Council has not determined that any loss of existing open space would be consistent with national policy, then it would not be appropriate for the allocation to assume, or even imply, this would be acceptable in principle. That the Council as landowner may have changed its position on what it may now wish to deliver on the site does not make the submitted policy unsound.

URB.19 – Albany Leisure Centre

235. Given there appears no realistic prospect of the site becoming available or delivered during the plan period, I am content that its continued allocation would not be justified. As such, the allocation should be deleted, with necessary consequential modifications to the housing trajectory and Policies Map.

Conclusion and next steps

236. The above is all without prejudice to any final decisions on the MMs that are necessary or their wording. The Council should now prepare a schedule of suggested main modifications for my consideration. As noted above, there should generally be one MM for changes to policy and one for supporting text incorporating all of the amendments identified as being necessary.
237. There will be then a period of discussion between myself and the Council via the Programme Office to agree the wording of the MMs that will go forward for consultation. There will be no prejudice to interested parties as the MMs will be subject to consultation in due course. Should I identify any additional actions that are not part of this letter or set out in other examination documents, then I shall inform the Council in the normal way. Any correspondence will be placed on the examination website. I shall follow the same process should any further review of the evidence, or change in circumstance, precipitate the need for additional actions.
238. The Council should also update the Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) to take account of the MMs. Should this exercise highlight any areas of concern, the Council should inform me as a matter of urgency. The updated documents should be consulted on alongside the MMs.
239. Prior to the consultation taking place, I may write to the Council setting out what, if any, other examination documents should be made available for comment at the same time as the MMs. I shall do this where I consider it necessary in the interests of fairness and/or where I would find comments helpful in coming to my final conclusions.
240. Once the consultation has started, representations should be sent to the Council, not the Programme Officer by the deadline set by the Council. Information about how to make representations will be published on the Council's website in due course, with links to that from the examination website. Any consultation on MMs should follow the same procedures as for the Regulation 19 consultation that took place prior to submission of the Plan.
241. As soon as possible after the consultation period, the Council should forward the representations to the Programme Officer along with a report listing all the representations, a brief summary of the main issues raised and the Council's brief response to those main issues. Those documents will be published on the examination website. I will consider all the representations, and the Council's responses to them, before finalising my report. Unless I consider it essential to deal with substantial issues raised in representations about the proposed MMs, or to ensure fairness, no further hearing sessions will be held after the consultation period.
242. My final report will set out my findings and reasoning in relation to all of the main issues and recommend the MMs that I finally decide are necessary to make the Plan legally compliant and sound as required by section 20(7C) of the 2004 Act. When the Council adopts the Plan, it must include all of the MMs that I recommend in my final report. It may also make additional modifications that it is satisfied would not materially affect the policies in the Plan.
243. I recognise that between this letter and the other actions already set out, there are a significant number of issues to address. Once the Council has considered the letter, I would be grateful if they could inform me of any timescales for completion of the

draft MM schedule and keep me updated on progress. The Council should also contact me through the Programme Officer if they have any queries about any of the above, including if they consider there to be any omissions or areas where further clarification is needed.

244. I shall ask for this letter to be added to the examination library. However, I am not inviting, nor shall I accept, any comments on the letter from interested parties.

Yours sincerely

Steven Lee

Inspector