

# **Enfield Local Plan 2019- 2039**

## **Statement on Regulation 18 Consultation**

(June to September 2021)



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## Executive summary

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This statement provides a summary of the Regulation 18 Enfield Local Plan 2019-2039 consultation which took place between June and September 2021.

Consultation on the draft Enfield Local Plan took place over a 12-week period, exceeding the statutory minimum and the requirements of the adopted Statement of Community Involvement. The consultation was promoted to the 1,600 subscribers to the Enfield Local Plan consultation database, and a dedicated web page was set up to host key consultation documents and publicise ways to get involved. Insofar as coronavirus arrangements allowed, copies of the draft Enfield Local Plan and key supporting documents were placed in Council libraries.

A digital advertising campaign, encompassing Facebook, Twitter and YouTube, was used to publicise local plan consultation to those who live, work and study in Enfield. The consultation was also promoted extensively in the Council's suite of newsletters. Press adverts were placed in several local newspapers, in English, Greek and Turkish.

In order to engage with 'hard to reach' groups, specific efforts were made to target the south and east of the borough through digital advertising, and a number of voluntary and community groups were specifically targeted for engagement. Particular attention was paid to reaching out to young people, through workshops with Enfield Youth Parliament, Oasis Hadley Academy, Enfield Grammar, and Alan Pullinger Youth Centre.

A number of workshop sessions were held with voluntary groups and businesses throughout the consultation period, including Enfield Sport, Local Estates Forum, Enfield Food Alliance, Friends of Parks, WENTA, and the Enfield Caribbean Association. In addition, drop-in sessions were held at Palmers Green, Ordnance Road, and Edmonton Green.

In total, 7,267 written responses were received, the vast majority (7,098) from individuals. Most responses were received by email, with approximately one third by letter. Of the individual responses received, 87% originated from Enfield postcodes, with 4% from the rest of London, and the remainder from outside London. Most of the Enfield responses received (41%) came from EN2. 18% originated in EN4, 16% from N21, whilst 2% came from N18 and N9.

Most comments received related to housing delivery, the impacts of new development, and the proposed limited release of Green Belt sites. In addition, several proposed site allocations attracted a number of responses. The key themes identified were as follows:

- Support and concerns of the need for additional housing
- Support and concerns of the Appropriateness of preferred housing target
- Support for proposed affordable housing targets
- Concerns around deliverability of affordable housing targets
- Opposition and support for Green Belt release
- Opposition to tall buildings – especially in Enfield Town
- Need to ensure sufficient infrastructure to support the level of growth proposed.
- Support and opposition to Chase Park and Crews Hill policies and site allocations (draft policies PL9 and PL10 and draft Site Allocations SA27 and SA28)

- Loss of large format food stores and associated car parking
- Opposition to the proposed development of Firs Farm Recreation Ground (SA59), Sainsburys Green Lanes (SA32), and Land between Camlet Way and Crescent West, Hadley Wood (SA45).

# 1. Introduction

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- 1.1 The purpose of this Consultation Statement is to summarise the feedback received response to the 'Enfield Local Plan: Main issues and preferred approaches' consultation document (ELP). This second Regulation 18 consultation ran for a 12-week period between 21 June and 13 September 2021.
- 1.2 This was the third formal consultation on the emerging Enfield Local Plan (a stage known as the "Regulation 18" stage<sup>1</sup>). This builds on the first Regulation 18 stage of consultation in 2015, and the second which ran for a 12-week period between December 2018 and January 2019.
- 1.3 The consultation carried out by the borough complied with the statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). The report also shows that public involvement was carried out following the approach set out in the Statement of Community Involvement (SCI)<sup>2</sup>. This report has been produced in accordance with Town and Country Planning (Local Development) (England) Regulations 2012 (Clause 22) (1)(c) (i-iv).
- 1.4 This statement provides a summary of consultation responses received for the public stakeholders and interested parties and identifies the key themes that emerged.

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<sup>1</sup> Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

<sup>2</sup> The SCI guides the approach to consultation stages throughout the preparation of the Local Plan. It sets out how the community should be engaged in the Local Plan process and at what stages that involvement should take place. Furthermore, the consultation and engagement activities have been carried out within the context of paragraph 16 (c) of the National Planning Policy Framework (NPPF) which states that plans should: "be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees"

## 2. How we consulted

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- 2.1 The Statement of Community Involvement (SCI) indicates that the Council will consult on the Regulation 18 Local Plan for a minimum of six weeks. It commits the Council to:
- consult with statutory bodies on the scope of the Integrated Impact Assessment;
  - undertake early engagement with relevant groups and organisations; and
  - carry out the 'duty to co-operate' requirement.
- 2.2 The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out legal requirements for local plan preparation. In preparing a local plan, the regulations (paragraph 18) indicate that a local authority must invite representations from:
- 'General' consultation bodies the LPA considers appropriate. These include voluntary, religious, ethnic, national, business and disabled persons groups;
  - 'Specific' consultation bodies that the LPA considers may have an interest in the subject of the plan. These include the Environment Agency, Natural England and adjoining local authorities (amongst others), as well as
  - 'such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.'
- 2.3 Account must be taken of representations made in response to invitations. The representations received must be addressed in a consultation statement, prepared in line with Regulation 22 of the Act.

### Promotion of the consultation

- 2.4 Consultation ran for a 12-week period from 21st June to 13th September 2021. This significantly exceeded the minimum 6-week period that was required by the Council's adopted Statement of Community Involvement.
- 2.5 The approach to publicity built on and exceeded minimum statutory obligations and the requirements of the Statement of Community Involvement.
- 2.6 At the outset of the consultation period, 1,600 subscribers to the Council's local plan database were notified of the consultation opportunity by email and letter. This was followed up by a 'reminder' on 2nd August. The Council's plan making team's mailing list consists of local residents, businesses, developers and agents who have expressed an interest in receiving planning-related updates from the Council, as well as 'specific' consultation bodies set out in the 2012 act (also known as 'statutory consultees').
- 2.7 The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020 temporarily removed the requirement to make paper copies of planning documents available 'on deposit' at libraries.
- 2.8 Despite this, the Council were mindful of the need to engage with residents who are digitally excluded, or who feel more comfortable dealing with printed rather than digital materials.
- 2.9 Copies of the draft ELP, draft Policies Map, Integrated Impact Assessment, Habitat Regulations Assessment, Whole Plan Viability Study, Infrastructure Delivery Plan,



Chase Park and Crews Hill Placemaking Studies, Housing Topic Paper, Employment Topic Paper, and Growth Topic Paper were placed in libraries for public view.

- 2.10 The documents were placed in the four hub libraries of Edmonton Green, Enfield Town, Palmers Green and Ordnance Unity Centre, as well as the community libraries of Bullsmoor, Enfield Highway, Enfield Island Village, Fore Street, John Jackson, Oakwood, Ridge Avenue, Winchmore Hill, and Bowes Road. These libraries are those which had, at the time of consultation, reopened as part of the relaxation of coronavirus regulations.
- 2.11 The consultation was publicised prominently on the Council's website, and a dedicated web page [www.enfield.gov.uk/enfieldlocalplan](http://www.enfield.gov.uk/enfieldlocalplan) provided key consultation documents and publicised ways to get involved. The consultation webpage was kept up to date throughout the consultation period with information about drop-in sessions and new resources (such as the local plan errata). Paper copies of the draft ELP and evidence base documents were also made available to purchase by the public.
- 2.12 The consultation was publicised throughout the consultation period on the Council's consultations webpage <https://new.enfield.gov.uk/consultations>, highlighting ways of responding.
- 2.13 A digital advertising campaign, encompassing Facebook, Twitter and YouTube, was used to publicise local plan consultation to those who live, work and study in Enfield. The campaign was targeted to encourage proportionate responses across age groups and wards and to try and ensure that all sectors of Enfield's communities were reached.
- 2.14 The main Facebook advert reached 64,000 people and resulted in 5,115 web visits from a borough-wide audience.
- 2.15 The Twitter advert reached 39,000 people, resulting in 707 web visits.
- 2.16 Web banner advertising on a wide variety of popular sites resulted in 206 web visits during the launch phase, and 156 web visits during the final weeks of the consultation window.
- 2.17 In addition to paid advertisements, organic social media posts were used to further embed key messaging on the scope and ambitions of the draft Enfield Local Plan, and to signpost readers to ways of getting involved. Organic posts were used on LinkedIn, Twitter and Facebook.
- 2.18 'Out of home' advertising was used to communicate the details of the consultation to audiences physically located throughout the borough. This included 17 large format advertisements were placed throughout the borough, and 700 posters were displayed by local businesses.
- 2.19 The draft ELP consultation was promoted extensively in the Council's suite of newsletters. These communicated key messages and ways to get involved to a range of residents and specialist stakeholders. The newsletters included:
  - News from the Council (50,382 subscribers). Stories featured on 24th June and 5th August, banners ads on 8th and 23rd July, and 2nd September. These resulted in 1,225 clicks through to the consultation platform;
  - Have Your Say (9,266 subscribers). Stories on 2nd July and 7th September resulted in 551 clicks through to the consultation platform;

- Improving Enfield (12,070 subscribers). A story featured on 10th August resulted in 464 clicks through to the consultation platform;
- Stories and banner ads also featured in Enjoy Enfield, Health and Wellbeing, Job and Training, Information for Young People, Improving Enfield, Volunteering in Enfield, and Information for Local Businesses;
- Press adverts were placed in several local newspapers, in English, Greek and Turkish. The adverts appeared in:
  - o Enfield Independent
  - o Avrupa
  - o Parikiaki
  - o Edmonton Green Magazine
  - o Housing News

2.20 Two press releases were used to disseminate key information to media outlets:

- 'Take part to help develop Enfield's future', issued on 21 June; and
- 'Enfield's plan to become the green heart of London and increase opportunities for all', issued on 2nd July.

2.21 Press engagement was evident in stories in Avrupa, Parikiaki, and Enfield Dispatch.

2.22 A total of 130,000 mailshots were printed and delivered to every household in the borough in mid-August which summarised key challenges and proposed approach taken by the draft ELP.

2.23 Efforts to promote the draft ELP consultation resulted in 16,400 visits to the Let's Talk platform. This is double the number of visits to the consultation platform as compared to the previous draft Local Plan consultation in 2018-19.

2.24 Visits to the Enfield Local Plan website <https://www.enfield.gov.uk/enfieldlocalplan> totalled 10,200 during the consultation period.

## **Hard to reach groups**

2.25 A key aim of the draft ELP consultation was to reach out to 'hard to reach' groups. Some residents may be harder to reach because of disadvantage, disempowerment, and other barriers.

2.26 The digital advertising campaign was targeted at the south and east of the borough, to better reach residents traditionally less likely to engage with Council consultations.

2.27 We also liaised with the third sector development officers within the Council to understand how best to engage. Drawing on existing relationships and contacts held within the Council, 97 groups were identified, encompassing a range of voluntary and community groups active in Enfield. These included groups whose activities focus on ability, faith, ethnicity, education, health and wellbeing activities. The groups were approached to see if they would like to disseminate details of the draft ELP consultation to their networks, and to offer the opportunity of a presentation and Q&A at their meetings so planning officers could provide an overview of the ambitions and scope of the draft ELP and answer questions.

- 2.28 In addition, the Council approached local sports organisations to try and reach younger age groups. This included Enfield Sport, Middlesex County Cricket Club and Middlesex Football Association.
- 2.29 As the draft ELP sets out a far-reaching strategy for the coming decades, particular attention was paid to engaging with young people to understand their priorities for the future of the borough. A multi-stranded approach was taken, encompassing:
- Enfield Youth Parliament – an initial ‘visioning’ session was followed up with a further session on the content of the draft Plan;
  - Oasis Hadley Academy – session with sixth form geography students;
  - Enfield Grammar – session with Year 10 Student Council; and
  - Youth Centre Session – with members of Enfield’s youth leadership group.

### Consultation workshops

- 2.30 A number of consultation workshops were held throughout the consultation period. A flexible approach was adopted to meet the needs of the consultees and the evolving coronavirus situation.
- 2.31 Many groups had adapted to the Government’s social distancing requirements by convening online meetings. Presentations given at these sessions followed the format of a brief introduction to the draft ELP, highlighting the need for a plan, main challenges and opportunities, and key themes. This was followed by a Q&A which provided an opportunity for a more wide-ranging discussion. Where in-person sessions were permitted, a more tailored approach was followed.
- 2.32 The following table provides a summary of draft ELP workshops undertaken as part of Local Plan consultation:

**Table 2.1:** Local Plan engagement workshops

Workshops	Method of engagement	Date
Enfield Youth Parliament pre-consultation engagement <sup>3</sup>	Online	09/02/2021
Oasis Hadley Academy	In-person	01/07/2021
Enfield Grammar year 10 student council	In-person	14/07/2021
Enfield Sport AGM	In-person	15/07/2021
Youth Centre session	In-person	19/07/2021
Overview and Scrutiny Committee	In-person	20/07/2021

<sup>3</sup> A pre-consultation engagement session was held with Enfield Youth Parliament on key priorities for the new Local Plan.

<b>Workshops</b>	<b>Method of engagement</b>	<b>Date</b>
Environment Forum - workshop	In-person	27/07/2021
Local Estates Forum	Online	27/07/2021
Enfield Food Alliance	Online	28/07/2021
Enfield Faith Forum	Online	28/07/2021
Friends of Parks and VCS	Online	03/08/2021
Customer Voice	Online	18/08/2021
WENTA business session	In-person	17/08/2021
Industry in Enfield workshop - agents, landowners and developers	Online	07/09/2021
Enfield Caribbean Association	Online	09/09/2021
Industry in Enfield workshop - businesses	Online	09/09/2021
Enfield Youth Parliament	Online	20/09/2021

## **Drop-in sessions**

- 2.33 In addition, drop-in sessions at local libraries and an outdoor community event were held during the consultation period to allow residents and other interested persons to view the draft Local Plan and supporting evidence, ask questions to Council officers, and share their views.
- 2.34 The drop-in sessions could only be arranged after coronavirus regulations were amended in the summer, as libraries' risk assessments indicated that public consultations could not be held in libraries until restrictions were lifted.
- 2.35 Three locations were chosen to encompass a large geographical area, providing good coverage of the borough. Sessions were held at Palmers Green Library, Ordnance Unity Centre Library, and Edmonton Green (part of the 'Month of Sundays' event). The catchments of Palmers Green, Ordnance Road and Edmonton Green events together cover a large geographical area of the borough. Residents were free to attend any of the events, and no one was excluded.
- 2.36 As the events were drop-in sessions a register was not taken. The drop-in session format enabled members of the public to turn up without an appointment and engage

in informal dialogue with officers and other visitors. However, a tally of visitors was taken:

- approximately 40 attendees for the morning and evening sessions at Palmers Green Library on 17 August;
- approximately 30 attendees for the Edmonton Green 'Month of Sundays' event on 22 August; and
- 35 attendees for the morning and evening sessions at the Ordnance Unity Centre on 26 August.

## How people could comment

2.37 In addition to sharing their views at workshops and drop-in sessions, individuals and organisations had three main ways to share their views:

- **By email** to: [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk). Email representations were acknowledged and logged, and redacted versions are available on the Council's website;
- **By post** to: Strategic Planning and Design, Enfield Council, FREEPOST NW5036 EN1 3BR. Postal responses were acknowledged and logged, and redacted versions are available on the Council's website; and
- Through a bespoke consultation platform <https://www.letstalk.enfield.gov.uk/localplan> set up to allow stakeholders to express their views.

2.38 A summary of consultation responses can be found in Appendix A.

2.39 The technical evidence base documents which supported Local Plan development were made available to view on the Council's website at <https://new.enfield.gov.uk/services/planning/evidence-base/>. In addition, several 'topic papers' covering the key issues of Growth, Housing, Employment, Chase Park and Crews Hill were made available.

2.40 An errata was published on 4 August 2021 to correct eight minor omissions and typographical errors. This was made available on the Council's website <https://new.enfield.gov.uk/services/planning/errata-to-the-enfield-local-plan-issues-and-preferred-approaches-planning.pdf>. The errata note was also distributed to libraries.

2.41 The Local Plan was written in plain English, limiting insofar as possible the use of jargon and technical terms. A glossary was prepared to define technical terms where their use could not be avoided.

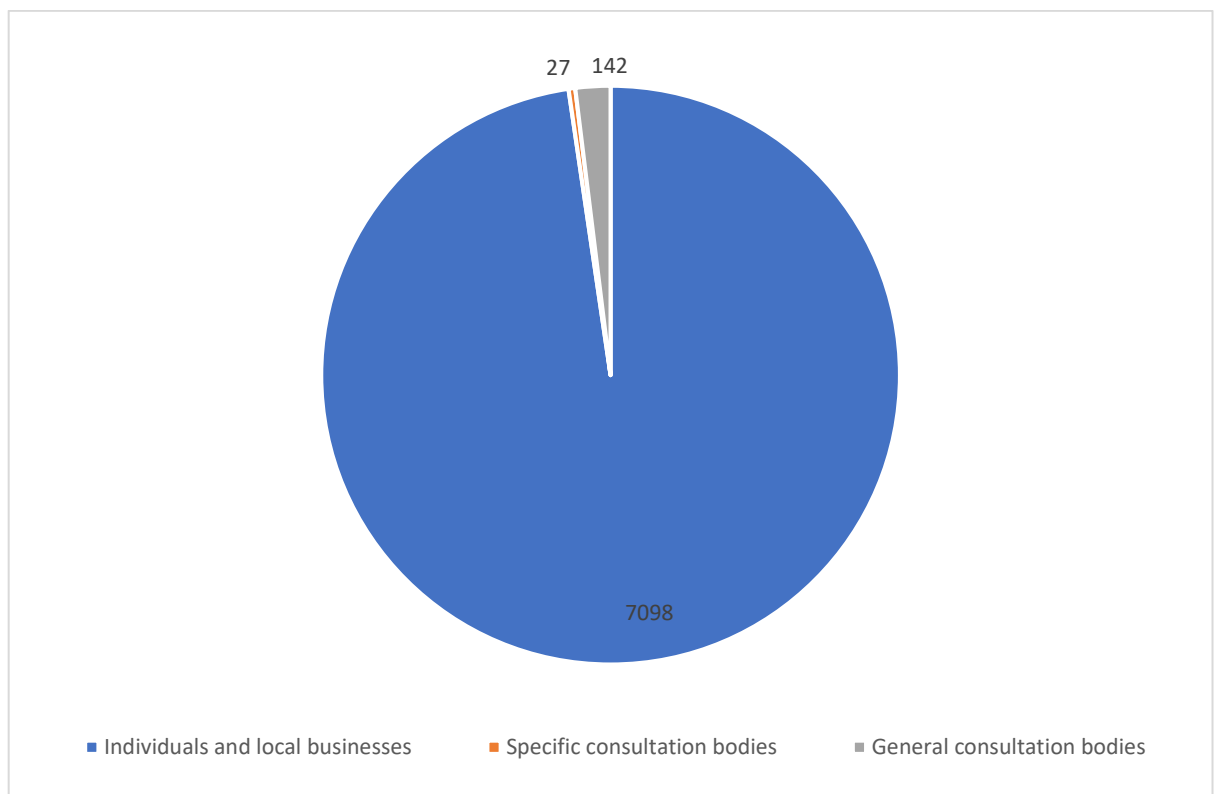
### 3. Responses to the consultation

3.1 This section summarises the main feedback from respondents to the draft Local Plan consultation. A more detailed summary of responses received, broken down by policy area, is available in Appendix A.

3.2 A total of **7,267** responses were received and a breakdown of representations by consultee types is as follows:

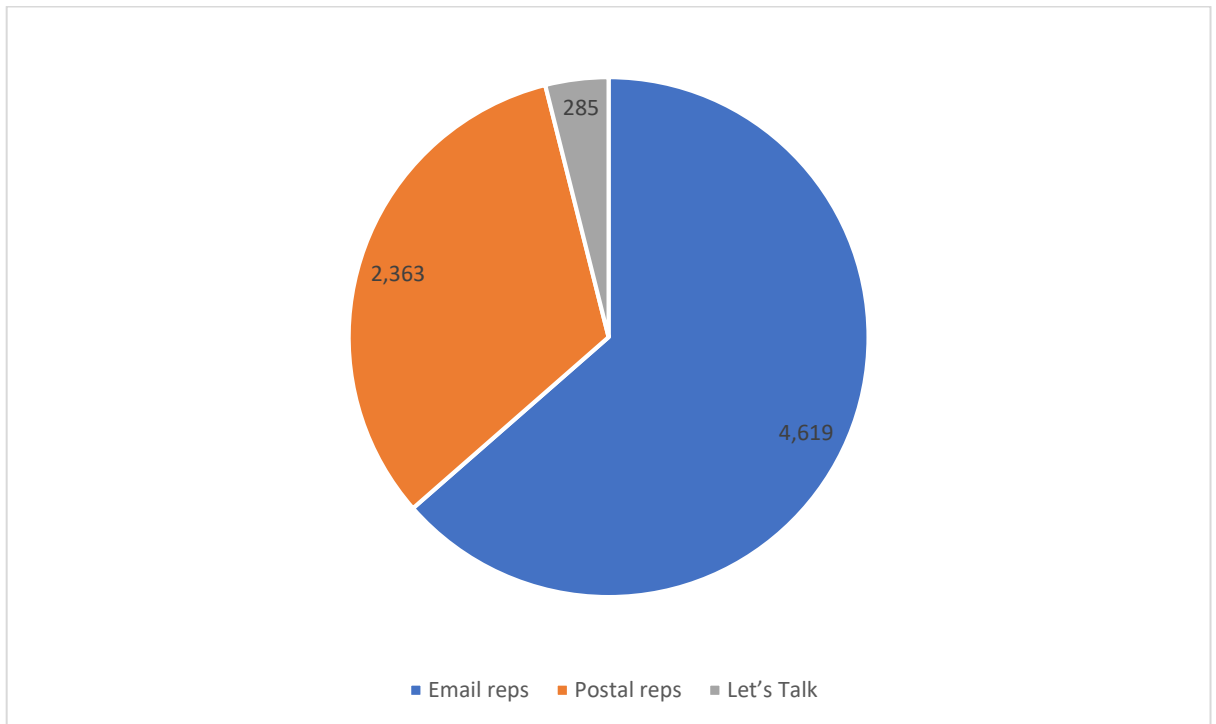
- **7,098** from individuals and local businesses;
- **27** from 'Specific' consultation bodies, also known as 'statutory' consultation bodies, including adjoining local authorities and national agencies such as the Environment Agency and Natural England; and
- **142** from 'General' consultation bodies, such as local voluntary and amenity groups:

**Figure 3.1:** Representation received by consultee type



3.3 In terms of the method by which representation were made, the vast majority of responses were received by email (**4,619**), followed by post (**2,363**) and the online Let's Talk platform (**285**).

**Figure 3.2:** Method of representation

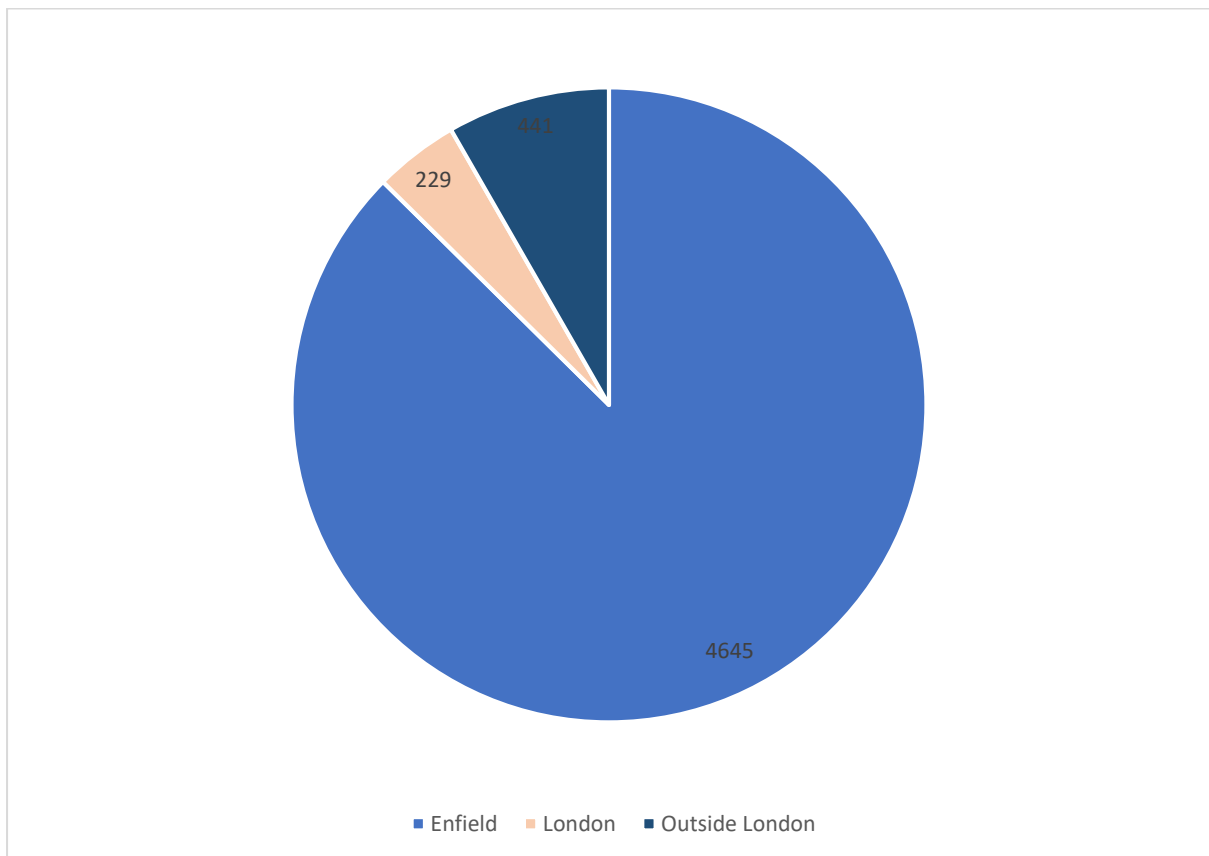


3.4 Representors were not obliged to provide their address details when making reps. For this reason, a comprehensive breakdown of the origin of all responses is not possible. However, approximately three quarters of individuals and local businesses who responded did include their address details, totalling **5,315**.

- 87% originated from 'Enfield'<sup>4</sup> postcodes.
- 4% came from the rest of London.
- 8% came from outside of London.

<sup>4</sup> As postcode boundaries do not map neatly onto local authority administrative boundaries, the following postcodes have been taken to comprise Enfield postcodes – EN1, EN2, EN3, EN4, N9, N11, N13, N14, N18, N21.

**Figure 3.3:** Origin of responses

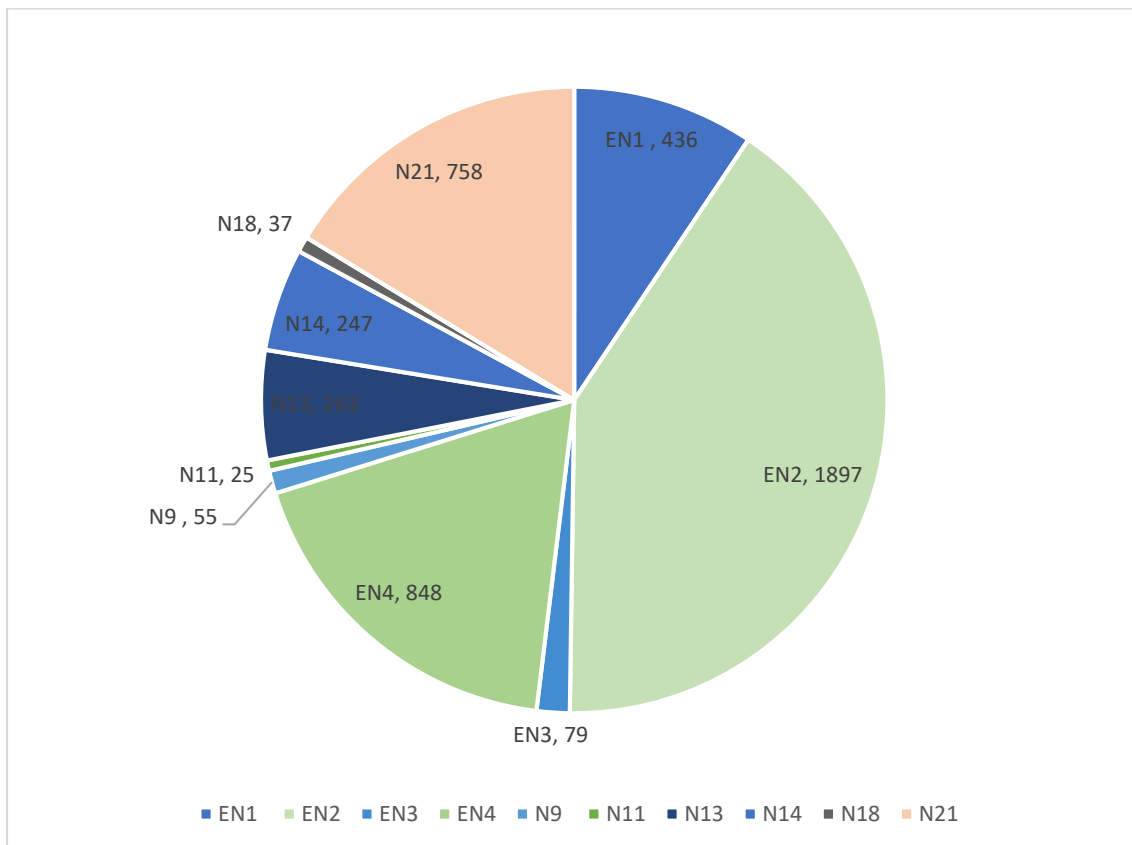


**3.5** In terms of Enfield responses received:

- 41% originated from EN2
- 18% originated in EN4
- 16% originated from N21
- Approximately 2% originated from N18 and N9.



**Figure 3.4: Breakdown of Enfield responses**



3.6 The large majority of comments were related to housing delivery, the potential impacts of new development and proposed limited release of Green Belt sites. In addition, several proposed site allocations attracted a number of responses. The key themes identified were as follows:

- Support and concerns of the need for additional housing
- Support and concerns of the appropriateness of preferred housing target
- Support for proposed affordable housing targets
- Concerns around deliverability of affordable housing targets
- Opposition and support for Green Belt release
- Opposition to tall buildings – especially in Enfield Town
- The need to ensure sufficient infrastructure to support the level of growth proposed
- Support and opposition to Chase Park and Crews Hill policies and site allocations (draft policies PL9 and PL10 and draft Site Allocations SA27 and SA28)
- The loss of large format food stores and associated car parking
- Opposition to the proposed development of: Firs Farm Recreation Ground (SA59), Sainsburys Green Lanes (SA32), and Land between Camlet Way and Crescent West, Hadley Wood (SA45).

3.7 These key feedback themes are summarised in table 3.1 below.

**Table 3.1:** Summary of comments by theme

Theme <sup>5</sup>	Summary of comments
<p>Support and concerns of the need for additional housing</p>	<p>Support from respondents for housing development and the ambition to meet Enfield’s housing needs. However, quantitative assessments of need were questioned, in particular noting the possible impacts of Brexit and the Covid-19 pandemic.</p> <p>Concerns from respondents about the negative impacts of the addition of new homes on the character of the borough, specifically the pleasant and quiet environment of many parts of Enfield.</p> <p>On the other hand, several respondents welcomed the prioritisation of well-connected brownfield sites (i.e. urban placemaking areas), as these would deliver benefits (including crime reduction) resulting from greater residential population.</p> <p>Several respondents suggested alternative locations which could accommodate more homes – including redundant commercial sites and Meridian Water.</p> <p>Benefits arising from an increased supply of new homes were raised by several – including a reduction in the number of households being forced to rent, reduction in households in temporary accommodation, greater ability for local people to stay in the borough, increased housing choice, reduction in waiting lists, and benefits for young people.</p>
<p>Support and concerns of the appropriateness of preferred housing target</p>	<p>Support from a wide range of organisations for the preferred option of delivering 25,000 new homes.</p> <p>However, concerns were also expressed from respondents that the plan’s housing target does not meet the requirements of the Government’s Standard Methodology and questioned whether the plan is ‘sound’ as a consequence.</p> <p>Similarly, some support from respondents was expressed for a higher target, given significant housing needs and historic Housing Delivery Test (HDT) results. Related to this, some respondents flagged implications of Enfield not meeting housing needs on neighbouring local authorities.</p>

<sup>5</sup> As set out in paragraph 3.6

Theme <sup>5</sup>	Summary of comments
	<p>Suggestions were made by respondents that an intermediate housing target option between 25,000 homes and 55,000 homes should have been tested through the Sustainability Appraisal process to ensure all reasonable alternatives had been considered.</p> <p>Some respondents argued that the proposed approach to setting the housing target did not comply with the approach set out in London Plan (2021) paragraph 4.1.11.</p> <p>Other respondents argued that that Covid-19 and Brexit would affect future population growth, with implications for the preferred housing target.</p>
Support for proposed affordable housing targets	<p>There was widespread support for building more affordable homes to tackle homelessness and wealth divides, and for securing at least 50% of new homes as genuinely affordable.</p> <p>Several respondents argued that new development should not 'price out' local people, and as a consequence welcomed the 50% affordable housing target.</p> <p>Specific support was expressed by respondents for the affordable housing target on Green Belt sites.</p>
Concerns around deliverability of affordable housing targets	<p>Several respondents raised concerns that residential development on Green Belt sites and Meridian Water would not provide sufficient provision of affordable housing.</p> <p>Some respondents expressed support for a more 'realistic' target to be stringently enforced.</p> <p>Several respondents raised the issue of viability and the need for flexibility when it comes to affordable housing requirements.</p> <p>Some respondents cautioned that affordable housing aspirations should be balanced against site specific circumstances, including the need for development to secure wider community benefits.</p>

Theme <sup>5</sup>	Summary of comments
<p>Opposition and support for Green Belt release</p>	<p>Strong support from respondents was expressed for a 'brownfield first' approach, only using Green Belt sites as a last resort. However, several respondents questioned whether enough had been done to fully exploit the potential of brownfield sites.</p> <p>Mixed views were expressed by respondents on whether housing need represents an exceptional circumstance for the release of Green Belt sites.</p> <p>Some respondents argued for alternative spatial strategy approaches to meet housing targets, including residential development on redundant industrial sites.</p> <p>Some support was expressed by respondents for limited release of Green Belt sites, with those that are well used or have nature conservation value safeguarded from development.</p> <p>However, many respondents objected to the release of any Green Belt sites. Several respondents highlighted that many sites proposed for release in the draft Local Plan form part of the historic Enfield Chase, a rare and valuable landscape asset.</p> <p>There were several respondents suggesting the Green Belt sites selected for release represented unsustainable locations for development. Many respondents pointed to the tensions between the 'deeply green' vision for Enfield and proposals to develop Green Belt sites.</p> <p>Several respondents highlighted negative impacts resulting from the loss of Green Belt sites on the 'character and charm' of Enfield, with harmful visual and landscape impacts.</p> <p>Several respondents also highlighted the value of Green Belt sites to biodiversity, climate change mitigation, and recreation (including mental and physical health benefits). Some argued specifically that development of high-quality countryside land should be avoided.</p> <p>Conversely, criticism was made by some respondents for the lack of greater ambition in terms of Green Belt release. Housing affordability was cited as a justification for greater Green Belt release to deliver housing.</p>

Theme <sup>5</sup>	Summary of comments
	Several respondents raised the need for a fairer distribution of new development across the borough, arguing that areas such as Crews Hill and the outer reaches of the borough should be prioritised rather than overcrowding districts like Edmonton and Ponders End.

## **4. Next steps**

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- 4.1 The responses to consultation received will inform the future stages of Local Plan development. These steps are set out in detail in the Council's adopted Local Development Scheme.

## A. Appendix A: Detailed summary of main issues

1. A number of events were held to elicit responses from a wide range of Enfield's communities, as set out in section 2 of this statement. This section summarises the wide range of responses received at the following engagement sessions.

**Table A.1:** Engagement sessions

When	Sessions
1 July 2021	Oasis Hadley Academy workshop session
19 July 2021	Alan Pullinger Youth Centre workshop session
15 July 2021	Enfield Sport Annual General Meeting
22 November 2021	Environment Forum
28 July 2021	Enfield Faith Forum workshop
3 August 2021	Friends of Parks and Voluntary Sector Strategy Group workshop
18 August 2021	Customer Voice workshop
17 August 2021 (am)	Palmers Green library drop in
17 August 2021 (pm)	Palmers Green library drop in
17 August 2021	Wenta business workshop
22 August 2021	Edmonton Green – street stall at 'Month of Sundays' event
26 August 2021 (am)	Ordnance Unity library drop-in
26 August 2021 (pm)	Ordnance Unity library drop-in
9 September 2021	Enfield Caribbean Association workshop
7 September 2021	Industrial landowners, developers and agents' workshop
9 September 2021	Industrial businesses workshop
20 September 2021	Enfield Youth Parliament workshop



2. The key issues raised by participants are summarised below.

**Table A.2:** Key issues raised

Issue	Summary
General	<ul style="list-style-type: none"> <li>- Reduction in east-west disparities in all respects – housing, greening and economic opportunities.</li> <li>- Achieving growth whilst safeguarding the environment and delivering energy efficient sustainable buildings.</li> <li>- Support for accommodating as much growth as possible in urban areas, whilst safeguarding the character of towns.</li> <li>- Danger in concentrating growth in the east of the borough which could create a poor environment. Growth should be spread more evenly throughout the borough.</li> <li>- Existing communities in regeneration/ placemaking areas should not lose out.</li> <li>- Support for maximising growth opportunities at Meridian Water.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>- Support for Enfield as a place of future opportunity, including the provision of more and affordable housing to facilitate this.</li> <li>- Tackling the housing crisis should be a priority. Need for new homes to address local needs, rather than for the wealthy. Family housing – units with 3 or more beds – should be provided.</li> <li>- Need for new housing to be properly supported by infrastructure.</li> </ul>
Green Belt	<ul style="list-style-type: none"> <li>- Concerns raised about developing homes at Crews Hill and Green Belt release more generally.</li> <li>- Support for protecting the Green Belt, with greenfield development as the last resort.</li> <li>- If parts of the Green Belt are developed, affordable housing should be prioritised.</li> <li>- Need to ensure that any development in Green Belt areas is properly served by infrastructure, including transport infrastructure.</li> </ul>
Climate change	<ul style="list-style-type: none"> <li>- Imperative to address climate change a key challenge.</li> <li>- Development should be designed to address the risk of overheating, prioritise reuse of materials.</li> <li>- Need to ensure housebuilding does not have a negative environmental impact.</li> </ul>

Issue	Summary
	<ul style="list-style-type: none"> <li>- Potential flooding impacts of new development need to be considered.</li> </ul>
Character	<ul style="list-style-type: none"> <li>- Need for development to reflect existing character, as growth could bring issues with height and loss of greenery. Need to densify in ways which respects character.</li> <li>- Opportunities for delivering density without towers should be explored.</li> <li>- Support for considering heritage in its built, landscape, social and environmental forms.</li> </ul>
Economy	<ul style="list-style-type: none"> <li>- Need to support job opportunities for young people in a range of sectors.</li> <li>- Support for providing sufficient space for businesses coming into the borough.</li> <li>- Employment opportunities should be provided close to home to reduce the need to travel.</li> </ul>
Green spaces	<ul style="list-style-type: none"> <li>- Support for green space preservation and improvements to biodiversity.</li> <li>- Existing and new green spaces should be multifunctional, including sports facilities and biodiverse planting.</li> </ul>
Leisure	<ul style="list-style-type: none"> <li>- Welcome recognition for sports and recreation, but more could be done with regards to laying pitches and community sport.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>- Support for active travel and car free development.</li> <li>- East west movement in Enfield is difficult and needs to be improved.</li> </ul>
Community	<ul style="list-style-type: none"> <li>- Health-related elements of the plan could be improved, especially since the pandemic has highlighted health inequalities.</li> <li>- Need for more community spaces for existing residents, and community space needs to be planned into new developments from the outset.</li> </ul>

3. Whilst a summary of issues raised has been provided above, comprehensive notes were taken at all sessions, and this feedback has been taken into consideration in revising the draft ELP.
4. The following table summarises the key themes emerging from each of the policies and proposals contained in the ELP.

5. We have grouped responses to reflect the structure of consultees in our Statement of Community Involvement (SCI):
- **Specific Bodies (Statutory)** – these are the bodies that we are bound to work together with by the Duty to Cooperate, the National Planning Policy Framework and also any locally prescribed bodies
  - **General bodies / other organisations** - these include but are not limited to, voluntary organisations representing certain groups within the community, environmental groups, local residents' associations, landowners and housebuilders
  - **Wider Community** - this category includes those who live, work or visit the Borough, who are making comments relating to their own personal views and are not responding on behalf of an organisations.



**Table A.3:** Summary of main issues – Chapter 1

Chapter or policy reference	Summary of main issues
Introduction	<p>Comments were received from the wider community only.</p> <p>The focus of response is for more clarification over what makes policies strategic where others are not.</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments noted related to this section.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• No comments noted related to this section.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Section 1.28 and table 1.1: The section could benefit from an explanation as to why certain policies are deemed strategic whereas other are not.</li> <li>• Section 2.2 of the ELP needs to recognise the need for Intra Enfield Connectivity – how residents in all parts of the Borough can access the various facilities – by roadside walking, pedestrian paths, cycleways and an extensive bus network. As well as highlighting how Enfield can connect to Central London, focus should be made of how all Enfield’s residents can share what it has to offer.</li> </ul>

**Table A.4:** Summary of main issues – Chapter 2: Good Growth in Enfield

Chapter or policy reference	Summary of main issues
Section 2.1: Spatial portrait	<b>Specific Bodies (Statutory)</b>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>Greater London Authority (GLA) noted that Chapter 2 of the draft plan provides excellent contextual description of the borough and background for the plan. GLA indicated that objectives within Table 2.1 (of the ELP) align well with many of the Mayor’s Good Growth objectives, including GG1, building strong and inclusive communities, and GG3, creating a healthy city.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Some developers suggested that the draft plan should include a reference to recreation and health, such as “Support a wide range of sports and recreational developments, especially innovative and regionally important facilities as these will enhance opportunities and health outcomes”</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>The wider community mentioned that the draft plan needs to acknowledge important strategic proposals in South East England such as the Oxford to Cambridge arc. Schemes such as this have important implications for Enfield and London. Implications of these proposals on population projections used in the plan should be understood and various scenario-based models should be constructed to model their impact on current population projections and housing need.</li> </ul>
Section 2.2: Key spatial issues	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comments noted related to this section.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Resident/businesses provided support for Figure 2.2 on the need to provide a range of housing to ensure that new and improved infrastructure is delivered to support the population increases and to preserve character areas and heritage and historic assets.</li> </ul> <p><b>Wider community</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Respondents commented that the document is ambiguous in relation to potential development within the Green Belt. For example, it was noted that a developer has already created plans for over 5,500 homes for the site at Vicarage Farm in anticipation that the area will be released.</li> <li>• Respondents commented that the plan states what planners believe could be built within the life of the plan, not what individual sites could eventually deliver. It was noted that there is an obvious disconnect between the two which would strongly suggest that the release of such sites on the scale proposed is not required. This disconnect impacts all the sites proposed for development within the whole plan. If the non-Green Belt sites can deliver more homes once built out, that of itself seriously challenges the document's argument for Green Belt release.</li> <li>• Respondents commented that despite opposing all de-designation proposals for sites within the Green Belt calls for greater transparency in relation to the number of homes these sites will deliver, not just the number within the plan period.</li> </ul>
Section 2.3: Spatial vision and objectives	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Hertsmere Council supported Enfield as a 'deeply green place'.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Strong support for several aspects of the vision and strategic objectives, in particular: <ul style="list-style-type: none"> <li>– SEGRO and Epping Forest Conservators support Enfield as a 'deeply green place'.</li> <li>– The Barnet Society supported the principle of using good design to create connected walkable communities, 50% affordable housing, ensuring new homes are supported by high quality infrastructure.</li> <li>– Some organisations pointed for minor changes for example the inclusion of Monken Hadley Brook on flooding and Strategic Objective, referring to regenerating industrial estates in economy Strategic Objectives.</li> </ul> </li> </ul>

Chapter or policy reference	Summary of main issues
	<p data-bbox="667 288 1823 316">– There were also several minor suggestions for changes to policies map/ key diagram.</p> <p data-bbox="618 347 864 375"><b>Wider community</b></p> <ul data-bbox="618 411 2029 954" style="list-style-type: none"> <li data-bbox="618 411 1424 438">• Need to specify the ‘unique challenges’ the borough faces.</li> <li data-bbox="618 475 2011 502">• Local Plan contents does not match its vision – namely, because of the proposed release of Green Belt.</li> <li data-bbox="618 539 1944 566">• Opportunity to embed Healthy Streets approach more widely rather than just in new developments.</li> <li data-bbox="618 603 2002 662">• Option of high-density housing around transport hubs as an alternative to Green Belt release should be explored more thoroughly.</li> <li data-bbox="618 699 2029 758">• The community noted that the plan sketches a vision where people will work from home and will not need to commute into London, which was felt not a realistic image.</li> <li data-bbox="618 794 1599 821">• It was noted that there should be a single strategic objective for housing</li> <li data-bbox="618 858 2020 954">• The community noted that it is wrong to set a firm plan for 18 years as things change and predictions will invariably be wrong. It was suggested that there should be a staged approach with an opportunity to review again particularly relevant given likelihood of government planning reform.</li> </ul>
Policy SS1: Spatial Strategy	<p data-bbox="618 1011 994 1038"><b>Specific Bodies (Statutory)</b></p> <ul data-bbox="618 1075 2020 1394" style="list-style-type: none"> <li data-bbox="618 1075 2011 1171">• Broad support from developers and statutory consultees on the preferred option (25,000 homes). It was noted that the approach accords with the Government’s objective to significantly boost the supply of homes as well as London Plan paragraph 4.1.11 in terms of setting housing requirements beyond 2029.</li> <li data-bbox="618 1203 2020 1267">• Most neighbouring authorities were supportive of the plan’s preferred strategy seeking to provide 25,000 homes to 2039, by rolling forward the London Plan requirement to 2039.</li> <li data-bbox="618 1299 2011 1394">• Welwyn Hatfield District Council raised concerns that rolling forward the London Plan requirement will result in an undersupply. Any undersupply would result in an increase in London’s growing backlog of unmet housing need. It would also drive increased levels of out-migration to surrounding areas. Welwyn</li> </ul>



Chapter or policy reference	Summary of main issues
	<p>Hatfield considers the Spatial Strategy should reflect the Enfield housing requirement in full by adopting the high growth option and is unlikely to be sound if it does not.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Some developers recognised the Council has clearly demonstrated that exceptional circumstances do exist for amending Green Belt boundaries. In particular, meeting housing needs is an exceptional circumstance justification to review the Green Belt, but this is compounded within LB Enfield given the nature of housing need – both in the Borough and across London – including acute affordability pressures and the need to deliver family homes (which becomes difficult/impossible within a spatial strategy that is overly focused on delivering urban intensification via high density redevelopment within the existing urban area).</li> <li>• There were mixed views on proposed future SIL extension in Southbury from landowners. Goodman Logistics Development UK Ltd stated their strong support for this, whilst the Universities Superannuation Scheme offered a dissenting voice, arguing for future flexibility.</li> <li>• There was general support for a new Local Plan, and it was accepted that the need to build a reasonable number of new sustainable and affordable properties in the borough. However, it was noted that the plan gives inadequate thought to the pressures on crucial local infrastructure requirements, development in the Green Belt is not sustainable and does not preserve local character and/or heritage.</li> <li>• There was broad support for the Spatial Strategy, but some developers considered that that the Plan should be bolder in its ambition to accommodate growth.</li> <li>• Some developers were concerned that the plan’s housing target set at a minimum of 25,000 over 20 years is not meeting the requirements of the Standard Methodology and question whether the plan is ‘sound’ as a consequence.</li> <li>• Broad support from developers and statutory consultees on the preferred option (25,000 homes). They considered the approach accords with the Government’s objective to significantly boost the supply of homes as well as London Plan paragraph 4.1.11 in terms of setting housing requirements beyond 2029.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• However, some developers indicated that whilst the borough can demonstrate a 5-year housing supply, Enfield has a significant housing need over the 20-year plan period and the preferred option within the draft Local Plan, is not sufficient to meet the identified needs of the borough and a higher growth option should be pursued. This will inevitably require greater intensification of brownfield land and existing urban areas, as well as additional Green Belt release than is currently proposed.</li> <li>• Developers indicated that the level of growth identified in the preferred option is insufficient to meet the identified housing need. There is a pressing need as a result of a national housing crisis, which is particularly prevalent in the South East and London. Therefore, it was suggested that a higher growth strategy is more appropriate.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• A high number of residents supported growth, but were concerned about the amount of development proposed on the Green Belt particularly around Crews Hill and Chase Park</li> <li>• Several respondents highlighted the potentially car-dependent nature of Green Belt development (namely Chase Park, Crews Hill, Hadley Wood (SA45), and the industrial site near Junction 24. They questioned the ability of stakeholders to provide effective infrastructure to serve these sites.</li> <li>• A high number of residents objected to the preferred strategy on the basis that the extensive use of the Green Belt for development goes against the purposes of the Green Belt and will damage the local environment and ecology, adding to the problems to climate change, take out a large proportion of land out of food production, degrade the land with pollution and road traffic and place undue strain on water resources.</li> <li>• A high number of residents believed that the proposed release of Green Belt cannot be described as being ‘sustainable’ – as these sites are not located close to passenger transport and other services, facilities and employment opportunities.</li> <li>• Many respondents supported the principle of the ‘brownfield first’ approach.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Many respondents felt that growth has been disproportionately concentrated in the borough, with residents indicating there is too much in the west of the borough and that growth should be focused on the east where there is existing infrastructure and is in need of significant regeneration.</li> <li>• Conversely, some residents felt that too much growth has been focused on the east of the borough and growth should be evenly spread across the borough.</li> <li>• Many respondents supported growth in the urban areas, particularly in town centres and areas around stations but objected to growth in Enfield Town and Southgate.</li> <li>• Respondents suggested that the plan should include more brownfield sites within sustainable locations such as the town centres and areas around stations rather than Green Belt sites.</li> <li>• Objections were raised with growth around stations in Enfield Town, Southgate and Cockfosters.</li> <li>• Many respondents questioned why the council is only planning for 5,000 homes at Meridian Water rather than the previously stated 10,000 homes, which would avoid the need to release Green Belt for housing.</li> <li>• On a similar point, the wider community questioned why the council had not considered growth at Brimsdown (SIL), Harbet Road (SIL) and other industrial sites/estates. They suggested that if these sites were promoted in the plan, then the release of Green Belt is not needed.</li> <li>• Many resident groups and local politicians supported the findings in CPRE's Report titled: 'Space to Build' re-emphasising that there is enough brownfield land in the borough to provide 30,000+ homes, so there is no need to release Green Belt for development. Overall, the wider community indicated that the plan had not included enough sites identified CPRE's report.</li> <li>• Many felt that development in the Green Belt would take away the opportunity for people to walk and have fresh air.</li> <li>• The potential air quality problems arising from growth and its link to mortality was raised.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Many respondents felt that the proposals to release Green Belt would have a damaging impact on the local character and quality of life for people who use the Green Belt/live nearby.</li> <li>• Respondents highlighted that there are major congestion issues near Hadley Wood, Chase Park and Crews Hill – and these areas would not be able to cope with additional development.</li> <li>• A higher number of residents indicated that the reason for housing need cannot be used to take land out of the Green Belt and does not represent ‘exceptional circumstances’ that are fully evidenced and justified.</li> <li>• Several respondents also raised issues of affordability with homes in the Green Belt, arguing that these sites would inevitably have expensive and exclusive homes, therefore not meeting local needs for cheaper housing.</li> <li>• Residents felt that the plan is conflicting and does not offer the full national protection of the Green Belt and the Council has misunderstood its responsibilities.</li> <li>• There was a small number of respondents who were fully supportive of the plans to release Green Belt and to reuse the golf course for housing for the local community to support the number of people on the council’s waiting list for social rented housing or people who can’t afford a home to get onto the property ladder.</li> <li>• A high number of residents indicated that the council must challenge the population projections taking into account the impacts of Brexit and Covid-19. It was suggested that a lot of people have left the UK and moved out of London therefore the number of people needing housing has reduced.</li> <li>• A number of residents indicated that the council must challenge the housing numbers (Mayor and Government) rather than just accept them.</li> <li>• Too much growth is focused on the South East, the council should challenge the national ‘top-down approach’ to housing and other options to consider growth outside of the borough should be properly explored.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Many residents urged the council to review the surplus retail floorspace, empty homes, industrial land- as some of the sites could potentially be considered for housing in the urban areas, without having to go into the Green Belt.</li> <li>• It is important that the council accounts for the change from office to homeworking as a result of the Covid-19 pandemic which is likely to result in a considerably reduced demand for office space within the borough, meaning that additional brownfield sites are likely to become available for residential development.</li> </ul>

**Table A.5:** Summary of main issues – Chapter 3: Place

Chapter or policy reference	Summary of main issues
Policy PL1: Enfield Town	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Historic England welcomed inclusion of Enfield Town as a placemaking area and the aim of improving accessibility and density in this key location.</li> <li>• However, Historic England felt the impacts on the historic environment had not been fully assessed.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• A number of civil society groups felt that tall buildings were not necessary in order to accommodate growth.</li> <li>• Enfield Ignatians highlighted the opportunity for developer gain to be captured to help deliver a sports village at Enfield Playing Fields.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• NHS CCG recognised that redevelopment offers an opportunity to improve health facilities.</li> </ul> <p><b>Wider community</b></p> <p>In general, there was concern over the level and height of development proposed in Enfield Town. There were also a number of comments which related more specifically to the sites contained within the placemaking area. These are summarised in later in the appendix for each specific site.</p> <p>A number of more specific points were also raised in relation to the extent of the area, and considerations which could be added.</p> <ul style="list-style-type: none"> <li>• Plans for Enfield Town are out of keeping with the character of the area. Proposals are considered as over-development.</li> <li>• Tall buildings will have a negative impact on the character.</li> <li>• Suggestion that popularity of high-rise development would reduce as popularity of working from home increases, therefore typologies proposed Enfield Town are inappropriate.</li> <li>• Respondents also suggested that the typologies would be unsuitable for families and therefore fail to achieve mixed and balanced communities.</li> <li>• It was suggested that local infrastructure would not be able to sustain level of growth proposed.</li> <li>• Possible undesirable impacts of taller buildings were highlighted such as overshadowing and microclimate impacts and increase to urban heat island effect.</li> <li>• The Enfield Town placemaking area is too narrowly defined.</li> <li>• There were concerns about the gyratory and one-way system, and suggestions that this should be dealt with, as it currently feels like a racetrack.</li> <li>• Enfield Town needs more of an evening economy.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Nature of improvements to be delivered which is mentioned in policy should be elaborated upon.</li> <li>• Respondents supported the development of an SPD but should be subject to meaningful consultation with the community.</li> <li>• Respondents support measures to improve public realm and vitality of the high street, but greater emphasis should be given to reducing vehicle dominance and improving air quality.</li> </ul>
Policy PL2: Southbury	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Hertfordshire County Council recognised the need to consider safety at key junctions was highlighted, to ensure no knock-on effects upstream and that public transport should be given same level of commitment as other areas.</li> <li>• TfL noted that the plan should be explicit with regards to what contributions will be sought in relation to TfL.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Many landowners supported the policy approach within / adjacent to SIL but highlighted that development should not compromise operation of SIL. (Goodman Logistics, British Land).</li> <li>• There was wide support for commitment to masterplanning (Enfield Society, NHS, British Land, and others).</li> <li>• Enfield Playing Fields should be recognised within policy and included within the placemaking area (Enfield Ignatians).</li> <li>• Some landowners noted that the policy wording requiring ‘no net loss of residential space’ was considered to be too negative and unnecessary (Morrisons).</li> <li>• Some industrial landowners objected to introduction of proposed permeability using walking routes through their sites (Westmill Foods, British Land).</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Concerned about proposal for so many homes in close proximity to such poor air quality (Feryal Clarke MP).</li> <li>• Housing development must be supported with adequate access to Green Space.</li> </ul> <p><b>Wider community</b></p> <p>In general, as with other placemaking areas, many of the concerns from the wider community related to the amount of development and impact on local infrastructure and services with some concern about possible heights. Specific to Southbury was concern over the loss of supermarkets, which many highlighted as a valuable local amenity.</p> <ul style="list-style-type: none"> <li>• Concern about the loss of supermarket amenities.</li> <li>• Concern about the height of buildings proposed.</li> <li>• Would have liked to see a clear walking and cycling route between Enfield Town and Southbury.</li> <li>• Unsure about the placemaking vision which describes the areas role as gateway to Enfield.</li> <li>• Maps have too many layers to be readable.</li> <li>• Has one of the highest levels of development proposed of the placemaking areas, despite having a relatively low PTAL – this will contribute to road congestion.</li> <li>• Scale of development will overwhelm local services.</li> <li>• Implication of policy wording is that east-west connectivity will be for motorised vehicles and this should exploit opportunity to maximise active travel to fullest potential.</li> </ul>
Policy PL3: Edmonton Green	<b>Specific Bodies (Statutory)</b>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Historic England recognised that that the approach underplays potential impact on Historic Environment.</li> <li>• There was explicit support from TfL for the need for car-free development.</li> <li>• TfL recognised that there should be some contributions to be ringfenced for Edmonton rail station and bus station improvements.</li> <li>• TfL recognised that the policy should be explicit with regards to what contributions will be sought in relation.</li> <li>• TfL suggested that the bus station should be explicitly safeguarded.</li> </ul> <p><b>General bodies / other organisations</b></p> <p>The majority of comments from developers/landowners were from Crosstree who have a land interest in Edmonton shopping centre, where a hybrid planning application is being determined.</p> <ul style="list-style-type: none"> <li>• Crosstree recognised the need for flexibility in relation to site allocation capacities.</li> <li>• Crosstree recognised there was conflict between existing tower heights and what is set out in the Character of Growth in terms of maximum acceptable heights.</li> <li>• Crosstree suggested that the policy should have greater specificity included in land use requirements.</li> </ul> <p><b>Wider community</b></p> <p>A small number of comments were received from residents on this placemaking area policy, suggesting that:</p> <ul style="list-style-type: none"> <li>• The vision seems very vague compared to other placemaking areas such as Southbury and Enfield Town.</li> <li>• Agree with need to better integrate Silver Street.</li> <li>• Object to impacts of tall buildings.</li> </ul>

Chapter or policy reference	Summary of main issues
Policy PL4: Angel Edmonton	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• There was general support for inclusion of placemaking area from specific bodies.</li> <li>• Historic England recognised that the policy underplays the potential impact on the historic environment at Angel Edmonton.</li> <li>• TfL considered the lack of certainty for delivery/funding for east-west BRT and suggested reference to this should therefore be removed.</li> <li>• Any proposals affecting North Circular should involve early discussion with TfL to establish feasibility and costs.</li> <li>• Hertfordshire County Council recognised that further commitment could be given for public transport improvements.</li> <li>• Sport England recognised that the vision mentions sport provision, but nothing has been included within the policy.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Haringey, Social Capital Partners, Enfield Society support for inclusion of the placemaking area in the ELP.</li> <li>• Langhedge Industrial estate should be included in boundary (Langhedge Industrial estate).</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Visions seem very vague compared to other placemaking areas such as Southbury and Enfield Town.</li> <li>• Object to tall buildings.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Respondents noted the lack of reference to Edmonton incinerator, but also recognised that it is not within the placemaking area.</li> </ul>
Policy PL5: Meridian Water	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• There was general support for inclusion of placemaking area.</li> <li>• The Lee Valley Regional Park Authority (LVRPA) suggested that a clearer statement was needed about the need to establish attractive and safe walking and cycling links through to Pickett’s Lock and to the Lee Valley Regional Park to the south.</li> <li>• Historic England suggested the policy underplays potential impact on historic environment in the Meridian Water area.</li> <li>• Sport England recognised that sports facilities should be inclusive for all ages and considered that the policy wording should reflect this.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• There was general support for the inclusion of Meridian Water as a placemaking area.</li> <li>• London Historic Parks and Gardens Trust object to loss of open space to create new parks.</li> <li>• The Conservative Group recognised that any speculation regarding the release of SIL should be made clear in policy text and highlighted that the GLA is not supportive of SIL release.</li> <li>• The Conservative Group recognised that clearer proposals with respect to retail provision and other non-residential space – are required.</li> <li>• Enfield Road Watch recognised that there is potential for delivery to be accelerated.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• The Enfield Climate Action Forum recognised the discrepancy between the Local Plan and other Council communications in relation to the number of homes that could be accommodated here i.e. 0,000 and 5,000 homes.</li> <li>• ENCAF recognised that Meridian Water will deliver less green space per person than Hong Kong. Green space / woodlands could be planned for in rest of the east of the borough.</li> <li>• Quod on behalf of Ikea considered that policies should not undermine Ikea’s present or future role.</li> <li>• Better Homes considered that Harbet Road industrial estate should be included within plan.</li> <li>• Loss of Green Belt unacceptable when Meridian Water delivery is so slow.</li> </ul> <p><b>Wider community</b></p> <p>Of all the urban placemaking areas, this policy received a substantial amount of comments and had the widest variety of comments from different residents. Much of this focused on matters that go beyond purely the local plan policy, focusing on frustrations with the slow delivery of the existing plans, and the discrepancy between the Local Plan and other Council communications in relation to the number of homes that could be accommodated here (i.e. the Local Plan does not propose to de-designate SIL and therefore proposes only 5,000 homes in the plan period at Meridian Water, whilst other communications allude to the Council’s overall vision to delivery 10,000 homes here in the long term – which is contingent on SIL de-designation.)</p> <p>Comments on this also linked to the potential for SIL de-designation to remove the need to release Green Belt for housing delivery.</p> <p>Other comments focused on the opportunities that could be unlocked through development here by improving connectivity to the waterways and open spaces.</p> <ul style="list-style-type: none"> <li>• The Council should build 10,000 new homes which would avoid need to build on the Green Belt.</li> <li>• The Council were told they could not release SIL at the Examination in Public relating to the Edmonton Leaside Area Action Plan.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Delivery at Meridian Water is taking a very long time compared to places like Tottenham Hale.</li> <li>• No mention of social rented housing at Meridian Water in policy, therefore object.</li> <li>• Respondents recognised that the Harbet Road industrial area is still designated SIL and is “beyond the proposed site allocation” it is to be “safeguarded for future plan periods”, but what those intentions might be should be considered now, since its extended use as SIL will impact on any housing, recreational and environmental use of space to the east of this area, as suggested in the current Local Plan.</li> <li>• There were significant concerns over the approach to the drafting of green space requirements for Meridian Water. Respondents raised concern that the LPA is drafting policy to serve the Council’s own needs. Concern that overall % targets should not be expected to be delivered on a phase-by-phase basis. The existing evidence base figure of 2.15 ha open space per 1,000 of population should be used.</li> <li>• There is no mention made of the Edmonton Incinerator – this should be included and is a concerning omission.</li> <li>• If land on east bank of Meridian Water does not get put forward for development, then the new homes delivered (and existing residences) will be cut off from the greenspace planned for delivery at Edmonton Marshes.</li> <li>• The area along the River Lee/Meridian Way could provide fantastic waterside living for our current and future residents and already has the infrastructure in place. Instead of pursuing release of Green Belt sites and high rise in Enfield Town. Respondents considered that the Administration should pursue an option that releases non SIL industrial land for mixed use development.</li> </ul>
Policy PL6: Southgate	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Historic England’s concern was noted over the potential impact of heights on listed buildings and the historic environment.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• LB Barnet supported the renewal of buildings but considered that building heights must respect the low-rise suburban character of the area.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Southgate District Civic Voice noted the potential impact of building heights on listed buildings and the historic environment.</li> <li>• Barnet and Southgate College - is keen to collaborate to help deliver vision for the placemaking area.</li> <li>• It was noted that greater clarity was needed in the diagrams – this was mentioned in relation to a number of placemaking areas.</li> <li>• Concern was highlighted over support for evening/night-time economy due to potential impact for surrounding residents.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Respondents raised concerns over the potential impact of building heights on listed buildings and the historic environment.</li> <li>• As with elsewhere in the borough, objections were lodged in relation to redevelopment of supermarkets.</li> <li>• The wider community considered that the pedestrian environment does not need enhancement, but design of Southgate Circus does require improvements as it is difficult to navigate.</li> <li>• Respondents noted that greater emphasis could be given to the relatively close links between Southgate and Palmers Green with walking and cycling route maximisation/enhancement in key locations would assist in achieving the vision.</li> <li>• The new walking route opportunity will be welcomed.</li> <li>• Concern over support for evening/night-time economy due to potential impact.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Vision has wording that is unfinished.</li> <li>• Further detail is required on the intensification sites – it is not clear what is intended for these, though there are many noted on the diagram.</li> <li>• It was noted that greater clarity was needed in the diagrams and specific comments were raised in relation to missed opportunities for proposed cycling routes.</li> <li>• Figure 3.7 includes Southgate Library as a site allocation, but it is not included within the plan.</li> <li>• The figure is missing items such as the tube station symbol and not all heritage assets are identified.</li> <li>• It was noted that Oakwood Park is missing from the list and the inclusion of ‘Southgate park’ was queried – it was not clear which park this is.</li> </ul>
Policy PL7: New Southgate	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The London boroughs of Haringey and Barnet support the inclusion of the placemaking area but are keen to see reference to cross borough cooperation with a joint planning framework.</li> <li>• Historic England recognises that the Policy underplays the potential impact on historic environment.</li> <li>• Sport England stated it is not clear how Arnos Pools has been identified as a facility requiring improvement.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• TfL Commercial Developments support the Council’s advocacy for tall buildings in area but want to see capacity of Arnos Grove uplifted.</li> </ul> <p><b>Wider community</b></p> <p>Limited feedback on this placemaking area.</p>

Chapter or policy reference	Summary of main issues
	Objection to tall buildings, as with elsewhere in the borough.
Policy PL8: Rural Enfield 'London National Park City'	<p>Mixed views were received on the principles of this policy.</p> <p>The main issue was highlighted in a public letter sent out by the National City Park Foundation and picked up by the wider community. The letter identified that the Plan misappropriates and misrepresents London National Park City and its status in support of a choice to de-designate Green Belt in the London Borough of Enfield.</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• LVRPA highlighted that the 'London National Park City' is an interesting concept and the Authority would welcome the opportunity to engage with the Council on this topic and consider how the concept might align with the Regional Park. They suggested that the Council should add emphasis on supporting LVRPA to realise potential of regional park within the policy.</li> <li>• A number of responses highlighted that the improvements would make marginal difference to the rural area, would remove local commercial food-growing as a viable option and would fail to compensate for the major harm inflicted by development on the targeted Green Belt sites.</li> <li>• Tottenham Hotspurs Football Club support this Policy which provides a positive approach to proposals which contribute positively to the delivery of the Rural Enfield objectives within the London National Park City and believes that the Lee Navigation can contribute to many of the aspirations set out in the Rural Enfield Vision, including the health and wellbeing gains.</li> <li>• The GLA welcomes Enfield's recognition and reflection of London's National Park City status through Policy PL8 of the draft Plan. They recognised that this policy makes a commitment to re-wild 1,000 ha of proposed woodland and open space, implement flood risk mitigation, create new or improved walking and cycling routes and provide much needed burial space among others.</li> </ul>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• The GLA is supportive of Policy PL8 in the draft Plan but considers it is difficult to reconcile how Enfield can support London’s National Park City status while simultaneously proposing the potential loss of approximately 186 ha of Green Belt land.</li> <li>• Sport England suggested that the Sporting hub at Tottenham Hotspurs was not assessed and the need for this was questioned. Confirmation was sought whether the Playing Pitch Strategy had informed the Local Plan.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The Canals and Rivers Trust support the policy, which provides a positive approach to proposals that contribute positively to the delivery of the Rural Enfield objectives within the London National Park City. They believe that the Lee Navigation can contribute to many of the aspirations set out in the Rural Enfield Vision, including the health and wellbeing gains.</li> <li>• It was suggested that uses such as music festivals should not be permitted in this area.</li> <li>• Some bodies supported encouragement within the policy for active travel even in rural areas.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Residents and local interest groups objected to the principle of the policy. The main issue they raised was that this policy justifies the loss of large parts of the most beautiful and strategically important Green Belt countryside by proposing ‘improvements’ elsewhere on the Green Belt paid for by development. They indicated that the Green Belt is not there to be ‘traded’. If the Council is serious about being ‘deeply green’ the entire Green Belt would be protected and enhanced.</li> <li>• Residents and local interest groups highlighted that the proposed improvements would make marginal difference to the rural area and would in no way compensate for the loss of beautiful open, historic countryside that is valued so highly by residents. The plan would also remove commercial food-growing as a viable option and would fail to compensate for the major harm inflicted by development on the targeted Green Belt sites.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Respondents considered that the policy misappropriates and misrepresents the ‘National Park City’ concept to justify de-designation of Green Belt and harmful development and are aware that the National Park City Foundation has been very critical of the attempt to justify development in the countryside by reference to the National Park City concept</li> <li>• Respondents considered that the ‘rewilding’ of Enfield Chase ignores the fact that the Green Belt areas targeted for development are equally parts of historic Enfield Chase and are irreplaceable. While improving access to the countryside is a laudable goal, this policy appears to treat Enfield’s Green Belt as a countryside theme park, rather than a functional eco-system, with a patchwork of habitats that are vital for wildlife and the potential to once again provide local food for local people.</li> <li>• Some residents provided support in principle to the idea of sensitive restoration of historic parks and gardens, protecting the Green Belt including open skylines, entrance points, strategic views and valued landscapes</li> <li>• Some residents suggested that the policy was just rebranding of green and blue infrastructure strategy</li> <li>• Detailed comments were made suggesting that many terms noted on the key for the placemaking vision diagram were not defined (green link, green loop etc) and further clarification should be provided.</li> </ul>
Policy PL9: Crews Hill	Comments in relation to the policy itself is set out under SA27.
Policy PL10: Chase Park	Comments in relation to the policy itself is set out under SA28.

**Table A.6:** Summary of main issues – Chapter 4: Sustainable Enfield

Chapter or policy reference	Summary of main issues
<p>Policy SE1: Responding to the climate change emergency</p>	<p>Broad support from many quarters, including Joanne McCartney MP who welcomed the ‘Positive and ambitious proposal’ set out in the policy wording.</p> <p><b>Specific Bodies (Statutory)</b></p> <p>Support was received from several specific bodies:</p> <ul style="list-style-type: none"> <li>• LB Waltham Forest – who were supportive of the comprehensive approach taken by the policies in this chapter to deliver the growth projected in the Local Plan period and beyond in a sustainable manner and the package of mitigation measures that will help the London Borough of Enfield respond to the various environmental and climate challenges detailed the Plan.’</li> <li>• The Greater London Authority – welcomed ‘draft Plan’s focus on sustainability and the borough’s ambitions to become carbon neutral by 2040.’</li> </ul> <p>However, some gaps were highlighted by:</p> <ul style="list-style-type: none"> <li>• Thames Water – they recommended that guidelines relating to water efficiency should be included, whilst the Environment Agency suggested that, whilst they support the intention of this policy, it would be useful for there to be a reference to reducing all sources of flood risk.</li> <li>• Natural England – they welcomed the consideration of climate change outlined in the chapter, but argue that consideration should be given to the role the natural environment plays in reducing the effects of climate change.</li> <li>• Hertfordshire County Council and the role played by sustainable transport in contributing to decarbonisation was highlighted as an additional point.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Enfield Climate Action Forum, Cockfosters Local Area Residents Association, and Henry Boot. The Enfield Society – expressed broad support for the policy, including support proposals for</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>environmental improvements to address climate change and improvements to biodiversity, urban greening, allotments and community food production, especially the de-culverting of watercourses and naturalisation of river channels.</p> <ul style="list-style-type: none"> <li>• The Canal and River Trust support the approach of the policy to encourage the provision of heating and hot water from low carbon sources of energy.</li> <li>• Some organisations pointed to gaps in this policy, or the chapter more generally for example: <ul style="list-style-type: none"> <li>○ the Conservative Group highlighted the crucial role that green spaces can play in mitigating the effects of climate change – including sites designated for release from the Green Belt.</li> <li>○ The Hadley Wood Neighbourhood Planning forum also pointed to the lack of reference to the natural environment in this policy. Better Streets for Enfield and the Enfield Cycling Campaign have highlighted the lack of a transport focus.</li> <li>○ Others argued for a more flexible approach.</li> <li>○ Connected Living London (Arnos Grove) Ltd suggested modifications to include wording such as ‘where possible’ and where ‘feasible.’</li> </ul> </li> </ul> <p><b>Wider community</b></p> <p>A number of these points were echoed by individual responses. The need to tackle the climate emergency through zero carbon development was raised, as well as the imperative to tackle heating and flooding risks. Climate change as a social justice issue was highlighted, alongside the need to consider the implications of LB Enfield Climate Action Plan. The environmental infrastructure benefits of the natural environment, including Green Belt sites, was raised by some.</p>
Policy SE2: Sustainable design and construction	<p><b>Specific Bodies (Statutory)</b></p> <p>No comments were received on this policy from specific consultees.</p>

Chapter or policy reference	Summary of main issues
	<p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The Strategic Property Services for Enfield Council support for Policy SE2.</li> <li>• Several development industry respondents pushed for greater flexibility, including TfL Commercial Development. SEGRO argued for a greater consideration of feasibility and viability in detailed requirements, while Henry Boot pointed to the challenge of achieving BREEAM Excellent on industrial schemes.</li> <li>• LaSalle IM requested that the requirement to submit a statement applies only to major new developments and excludes change of use and refurbishment.</li> <li>• The Home Builders Federation argued that building regulations should be used in preference to impose planning requirements on building performance.</li> <li>• Some argued that policy requirements should be more exacting.</li> <li>• The Hadley Wood Neighbourhood Planning Forum stated that ‘The mere requirement to provide a statement (on sustainable design and construction) is pointless. Quantifiable limits and measurements that the actual construction must comply with are instead required.’</li> <li>• Affinity Water argued that this policy should contain requirements on water efficiency.</li> </ul> <p><b>Wider community</b></p> <p>Wider responses included the suggestion that all developments should be required to meet the certification standards set out in the policy.</p>
Policy SE3: Whole life carbon and circular economy	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The GLA stated their support, ‘Policy DM SE3 which requires circular economy statements for all major development proposals is particularly welcome and supported as it exceeds the Mayor’s</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>requirement for circular economy statements for all referable planning applications as set out in Policy SI 7 of the LP2021.’</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Several development industry representations argued for less stringent standards, such as Connected Living London (Cockfosters Site), who argued that whole life cycle carbon requirements should apply to developments referable to the Mayor of London.</li> <li>• LaSalle IM suggested that the policy should apply only to major development proposals resulting in the creation of 1,000 sqm or more of new floor area (in the case of non-residential development).</li> <li>• The policy was supported by LBE Strategic Property Services.</li> <li>• British Land recommended that Table 4.1 is updated to reflect the updated targets adopted by the RIBA and LETI, ‘which represent the industry standard for whole life cycle carbon benchmarking’.</li> <li>• Enfield Climate Action Forum questioned whether this policy would be followed by the council.</li> <li>• Cockfosters Local Area Residents Association made the observation that high-rise concrete structures are carbon intensive and should be discouraged.</li> </ul> <p><b>Wider community</b></p> <p>Respondents expressed support for an approach which prioritises the re-use and retrofit of existing buildings, with the implication that green field development should be minimised. Some commented on the carbon implications of the Edmonton Incinerator.</p>
Policy SE4: Reducing energy demand	<p><b>Specific Bodies (Statutory)</b></p> <p>No comments were received on this policy from specific consultees.</p> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Several development industry representations argued for greater flexibility, such as LaSalle IM who argued for a greater consideration of feasibility and viability and Connected Living London (Cockfosters Site) who argued for an ‘aim to’ approach to specified standards.</li> <li>• The Home Builders Federation argued in favour of a national standardised approach, and ‘advise strongly against the council making policy in this area.’</li> <li>• Connected Living London (in relation to the Cockfosters Site) pointed to a lack of clarity on what the specific standards contained within Table 4.2 had been based.</li> <li>• Origin Housing, Regenta Development and Notting Hill Genesis characterised the requirement to report energy use for 5 years after occupation as ‘onerous’.</li> <li>• Support was expressed from LBE Strategic Property Services.</li> </ul> <p><b>Wider community</b></p> <p>No specific comments were received on this policy from individuals and local businesses.</p>
Policy SE5: Greenhouse gas emissions and low carbon	<p><b>Specific Bodies (Statutory)</b></p> <p>No comments were received on this policy from specific consultees.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Several development industry representations argued for amended wording to introduce greater flexibility.</li> <li>• Areli for Blackrock and a consortium of landowners suggested that net zero carbon strategy be developed in collaboration with stakeholders and developers.</li> <li>• Crosstree, SEGRO and LaSalle IM stressed the need to take into account feasibility and viability considerations.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Connected Living London (in relation to the Arnos Grove site) argued that no evidence has been provided that such targets (such as the 45% figure) are realistic or feasible, arguing for a viability tested approach.</li> <li>• A similar point was raised by TfL Commercial Development.</li> <li>• Enfield Climate Action Forum, referring to the requirement that ‘temporary fossil-fuel primary heat sources must only be installed for a maximum of five years prior to connection to an approved low carbon heat source, contended that temporary solutions tend to become permanent.</li> </ul> <p><b>Wider community</b></p> <p>One individual commented on the proposals for an incinerator at Edmonton with regards to the requirements of this policy.</p>
Policy SE6: Renewable energy development	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments were received on this policy from specific consultees.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• LBE Strategic Property Services expressed support for this policy.</li> </ul> <p><b>Wider community</b></p> <p>One individual commented on the proposals for an incinerator at Edmonton with regards to this policy.</p>
Policy SE7: Climate change adaptation and managing heat risk	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments were received on this policy from specific consultees.</li> </ul> <p><b>General bodies / other organisations</b></p>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• LBE Strategic Property Services expressed support for this policy.</li> <li>• Other development industry respondents did not provide detailed comments on this policy; only British Land commented that cooling contribution requirements would be subject to CIL Regulation 122 tests for planning contributions.</li> <li>• Enfield Climate Action Forum argued that tower blocks would need air conditioning to address overheating, while Hadley Wood Neighbourhood Planning Forum argued that the policy highlights why development on brownfield land before greenfield, and Green Belt, is required.</li> </ul> <p><b>Wider community</b></p> <p>No specific comments were received on this policy from individuals and local businesses.</p>
Policy SE8: Managing flood risk	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Thames Water’s main concerns with regard to subterranean development is the scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water’s sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network.</li> <li>• The Environment Agency noted, overall in terms of flood risk this submission is very encouraging, and they consider it to have some strong flood risk policies. There is work to be done on the place-based strategic policies, relating to those sites being allocated which are partially in flood plains, as these must be informed by the Level 2 SFRA and include any site-specific flood risk recommendations (following demonstration that the Sequential Test has been passed).</li> <li>• Highways England noted in relation to drainage and the SRN, it is important to note that no new connections are permitted to Highways England drainage network. In the case of an existing ‘permitted’ connection, this can only be retained if there is no land use change. Development must not lead to any surface water flooding on the SRN carriageway. These points apply to the site</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>operation and construction phases. Highways England should be contacted to discuss these points in detail as part of, or in advance of a planning application submission.</p> <ul style="list-style-type: none"> <li>The Environment agency note that Vicarage Farm soak-away is part of the Salmon's Brook Flood Alleviation Scheme, designed to prevent Salmon's Brook being overwhelmed upstream, and hence leading to flooding in areas around Slades Hill/Enfield Road and beyond. Intensive building on these natural uplands soak-aways, combined with the additional run off from roads and pavements in the proposed development would overwhelm the tributaries of Salmon's Brook and, in an exceptional rainfall event, could overwhelm the bund on Cheyne Walk Open Space. It was noted that in the LBE Strategic Flood Assessment it states: <i>"further design work and liaison with LBE Lead Local Flood Authority may be required to understand the implications of surface water flooding to the proposed development."</i> The EA emphasised that this should have been undertaken PRIOR to proceeding to propose building on this critical site. The EA found it hard to believe that, given the statements issued by the Environment Agency previously that this can be an acceptable area for development. For these many reasons the EA strongly object to the proposal to build on 'Chase Park'.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>The Hadley Wood Conservation Area Study Group noted the current civil engineering infrastructure in Hadley Wood has been rendered inadequate by the addition in the last few years of a high number of new dwellings as residents have developed their back gardens. Parts of Hadley Wood are prone to flooding and that is exacerbated by the fact that we now have too many properties dependant on waste and sewerage systems that were not designed for the number of houses now using them. The addition of 160 new households, all at once, to the current drainage and sewerage systems is a recipe for disaster. The Draft Plan nowhere recognises this very real issue and so, clearly, there is no intent to match the proposed introduction of 160 households with proportionate sewage capacity. The increased flood risk that such development would bring is a recipe for disaster which will harm the whole of Hadley Wood and, by definition, in doing so will harm the Conservation Area.</li> <li>The Enfield Society in principle supports the following policies and proposals for environmental improvements to address climate change and improvements to biodiversity, urban greening,</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>allotments and community food production, especially the de-culverting of watercourses and naturalisation of river channels.</p> <ul style="list-style-type: none"> <li>• Developers and Landowners have noted support for the draft policy.</li> </ul> <p><b>Wider community</b></p> <p>There is support for the policy from community groups.</p>
Policy SE9: Protecting and improving watercourses	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Canals and River Trust suggest that a requirement should be added to section 1 of this policy to ensure that development does not adversely affect waterway infrastructure, which may result in an increased risk of flooding, land instability and/or inhibit navigation. Waterway walls that support the banks of navigable waterways and towpaths were not designed with the consideration of modern -day loadings. Additional loadings may be temporary or permanent and may include items such as buildings, embankments, scaffolding, construction plant &amp; equipment, roadways and new foundations. Any lateral or vertical surcharge on waterway walls poses a risk to navigations and surrounding land uses.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Landowners consider the wording to be overly prescriptive and not flexible enough to account for site constraints that may prevent the inclusion of an 8m set back in every circumstance. The wording of Part 6 is not consistent with the flexibility of Part C of London Plan Policy SI 12 which does not specify the minimum of 8 metre setback for developments in proximity to watercourses, stating that development proposals should ensure that flood risk is minimised and mitigated, and this should include, where possible, “making space for water and aiming for development to be set back from the banks of watercourses”.</li> <li>• Landowners consider that an 8m set back distance may normally be applied, but that in urban areas a ‘balanced’ approach should be adopted with proposals considered on a case by case basis. The draft policy wording should also be amended such that it allows for this flexible approach in terms of</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>development proposals providing 8m set back distances in some areas of the proposal and not others, again subject to site constraints and feasibility of the wider development proposal. Indeed, an 8m set back distance may not always be required to allow for maintenance access along the entirety of a waterway and should therefore be subject to consultation with the Environment Agency again on a case by case basis, rather than prescribed by planning policy.</p> <p><b>Wider community</b></p> <p>The Enfield Society in principle supports the following policy and proposals for environmental improvements to address climate change and improvements to biodiversity, urban greening, allotments and community food production, especially the de-culverting of watercourses and naturalisation of river channels.</p>
Policy SE10: Sustainable drainage systems	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency note whilst it is good to see consideration of site condition and appropriateness for SuDS, the discussion of SuDS solutions at potentially contaminated sites should be expanded (or explanation provided) to discuss the potential need for an Environmental Permit for discharges of surface water run-off.</li> <li>• Highways England note in relation to drainage and the SRN, it is important to note that no new connections are permitted to Highways England drainage network. In the case of an existing 'permitted' connection, this can only be retained if there is no land use change. Development must not lead to any surface water flooding on the SRN carriageway.</li> <li>• The Canals and Rivers Trust note subject to agreement with the Trust (including our consideration of environmental and operational issues), surface water can be drained to their waterways as part of a Sustainable Urban Drainage solution. They suggest that the supporting text to policy SE10 recognises the need for this agreement where discharge to the Lee Navigation is proposed and that pre-application discussions are encouraged.</li> </ul> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>Landowners recommend alternative wording noting a Sustainable Drainage Strategy will be required for all major developments or those where the inclusion of Sustainable Drainage Systems are necessary, to demonstrate how the proposed measures manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan.</li> </ul> <p><b>Wider community</b></p> <p>Community groups note drainage strategies do not appear to be explicitly covered, with para 4.8.12 containing materially weaker wording than adopted policy, as it merely states that development proposals “should” provide a sustainable drainage strategy”. Wording must be changed.</p>

**Table A.7:** Summary of main issues – Chapter 5: Addressing equality and improving health and wellbeing

Chapter or policy reference	Summary of main issues
<p>Policy SC1: Improving health and wellbeing of Enfield’s diverse communities</p>	<p><b>Specific Bodies (Statutory)</b></p> <p>In general, strong support for several aspects of Improving health and wellbeing of Enfield's diverse communities.</p> <ul style="list-style-type: none"> <li>Enfield’s recognition of sustainable transport to achieve healthier lifestyles, which involves safe cycling routes, attractive walking route and easy access to public transport to reduce car dependency.</li> <li>The Canal and River Trust, agrees with the blue corridors are identified in plan, as an important component of reducing health inequalities in policy SC1 and strongly supports the requirement to consider how design can support wellbeing and greater physical movement as part of everyday routines.</li> <li>NHS London Healthy Urban Development Unit noted that this policy reflects the London Plan Healthy City Good Growth objective (GG3).</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>○ They suggest that additional clauses to be added which refers to the use the Healthy Streets approach in planning decisions (see Policy DM T2 Making active travel the natural choice), the need to mitigate the adverse negative health impacts of noise and air quality (see Strategic Policy SP ENV1: Local environmental protection) and to ensure that the design of new homes encourage healthy lifestyles and avoid health problems associated with damp, heat and cold (see Policy DM DE13: Housing standards and design).</li> <li>○ Strongly support in the requirement to carry out health impact assessments (HIA) to accompany planning applications, with suggestions to further clarify different types of development that would require an HIA, and to encourage the use of the HUDU Rapid HIA tool for larger residential-led development proposals.</li> <li>○ Suggestion to move paragraph 5.1.5 which refers to the use of the NHS Healthy Urban Development Unit's "Planning Contribution Model for London" under Strategic Policy SP SC2 which deals with healthcare infrastructure.</li> <li>● Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England along with Public Health England have launched our revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy with many elements of the Draft Local Plan. Active Design is also mentioned specifically in Strategic Policy SP SC1 which is supported by Sport England.</li> <li>● Sport England recommend, however, that the links between the proposed draft and Active Design can be developed and strengthened, especially given the Council's intention to improve the health and wellbeing of the borough's population. In this respect Sport England have the following comments in relation to Active Design that could be considered: Strategic Policy SP SC1, which seeks to improve the health and wellbeing of Enfield's diverse communities, does specifically state that proposals will be expected to incorporate Active Design principles. Sport England, however, recommend that the supporting text elaborates on the principles and provides links to the guidance to assist developers and planning officers. It would also recommend to fully embed the principles by</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>requiring planning applications, in addition to Heath Impact Assessments, to include a completed Active Design Checklist that demonstrates how the principles were incorporated within a proposals' design.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Better Streets for Enfield and the Enfield Cycling Campaign suggest, the need more literature local on life expectancy, to demonstrate life expectancy gap across the borough over seven years between Cockfosters and Upper Edmonton. With reference to how Active travel can support the closing of this gap. As well as to consider its position on e-scooters once the current trial is concluded- this has the potential to remove a lot of cars from the road and improve health. A lot of journeys to local workplaces could be cut, including those were working from home is not an option such as schools and hospitals.</li> <li>• More literature how the plan adds to or diminish pressures on provision of and access to primary health.</li> <li>• The A406 North Circular is the site of the proposed enlarged waste incinerator in Upper Edmonton- need information about the way in which the microparticle emissions and their impact on health including guidance from DEFRA to Directors of Public Health which states "There is no safe level for particulate matter (PM10, PM2.5), while NO2 is associated with adverse health effects at concentrations at and below the legal limits". The Local Plan fails to mention this, or the increased vehicular movements associated with the intention to import waste from beyond the boundaries of the North London Waste Authority.</li> <li>• The plan should consider the creation of woodland and appropriate green space for shade in the East of the borough, this is a major health concern given the changes in climate and the mid-summer temperatures. The urban heat island (UHI) effect is considerable in those areas and areas of green space and woodland of sufficient size are known to alleviate the issue and lower temperatures.</li> <li>• The plan needs to carefully consider the spatial distribution of development, it's impacts on heat and the social and economic east/west divide in the borough. The Integrated Impact Assessment Appendix A 4.26 explains the UHI and illustrates how Enfield is affected by summer heating in</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>comparison to the rest of London. It concludes that the east of the borough is more adversely affected by heat and, that since poorer Londoners will be more adversely affected by UHI, and that heat is more of an issue in the east of the borough.</p> <ul style="list-style-type: none"> <li>• Meridian Water development should deliver a higher proportion of open green space. The Local Plan could address this by planning for green space and woodlands where they are most needed to address health and social inequalities in the east of the borough.</li> <li>• Chase Park Topic Paper HIC6 and HIC 10 are promoted as sites for extra care or older age housing. The plan should show how primary health infrastructure will be able to cope with the demands of poor air quality, excessive heat and an ageing population; and health, wellbeing and equality in Enfield will undoubtedly suffer.</li> <li>• When considering equality, it is an important legal obligation under the Equality Act 2010/Public Sector Equality Duty for the planning authority to have due regard to the need to: eliminate discrimination, harassment, victimisation, and other conduct prohibited under the Act; <ul style="list-style-type: none"> <li>- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and,</li> <li>- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.</li> </ul> </li> <li>• The protected characteristics are age; disability; gender reassignment; marriage and civil partnership (this characteristic is excluded from the PSED); pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Aspects of Plan suggest that it has been developed without the consideration of protected groups required by law, e.g. elimination of car parks and significant numbers of tall buildings.</li> <li>• The policy sets out that proposals will be expected to contribute to healthy and active lifestyles and include measures to reduce health inequalities through the provision of a set list of identified methods. It is understood that health and wellbeing play an important role in communities however, some of these identified methods should be provided at a Borough wide level and then filtered down through individual developments. They are not methods that could be provided without direction of</li> </ul>



Chapter or policy reference	Summary of main issues
	<p>the Council, and its evidence base documents, and collaborative working. Recommended changes: Strategic Policy SP SC1 1. to be amended from 'Proposals will be expected to contribute to promote healthy and active lifestyles and include measures to reduce health inequalities through the provision of contribution to.'</p> <ul style="list-style-type: none"> <li>• Strategic Policy SP SC1 1- to be amended from 'Proposals will be expected to contribute to promote healthy and active lifestyles and include measures to reduce health inequalities through the provision of contribution to.'</li> <li>• Recommend alternative wording - "Proposals will be expected to promote healthy and active lifestyles and include measures to reduce health inequalities through contribution to."</li> <li>• Recommended addition/wording- that LB Enfield will support proposals that are directly concerned with the provision of sport/leisure and recreation.</li> <li>• To ensure a comprehensive approach, additional clauses are suggested referring to the use the Healthy Streets approach in planning decisions (see Policy DM T2 Making active travel the natural choice), the need to mitigate the adverse negative health impacts of noise and air quality (see Strategic Policy SP ENV1: Local environmental protection) and to ensure that the design of new homes encourage healthy lifestyles and avoid health problems associated with damp, heat and cold (see Policy DM DE13: Housing standards and design).</li> <li>• The loss of Green Belt would cause a significant amount of harm to residents' health.</li> </ul> <p><b>Wider community</b></p> <p>A number of residents emphasised the importance of the green space and accessibility to support to Improving Health and Wellbeing of Enfield residents.</p>
Policy SC2: Protecting and enhancing social and community infrastructure	<b>Specific Bodies (Statutory)</b>

Chapter or policy reference	Summary of main issues
	<p>Broad support on several aspects of Protecting and enhancing social and community infrastructure with some suggestions:</p> <ul style="list-style-type: none"> <li>• Metropolitan Police Service note that the policy indicates contributions are towards schools (subsection 3) and health / social care (subsection 4) and to include a new subsection (5) on policing infrastructure will be sought from major developments.</li> <li>• NHS London Healthy Urban Development Unit, the support for new social and community infrastructure but suggest: <ul style="list-style-type: none"> <li>○ considering the redevelopment or disposal of surplus NHS sites to consider that the policy should be sufficiently flexible to allow the loss of a facility, or part disposal of a site, where declared surplus to requirements in accordance with service transformation and estate strategies. The redevelopment of NHS sites and the introduction of housing and other uses provides vital investment to re-invest in new and improved health facilities which are fit for purpose. In order to accord with clauses F and G of London Plan Policy S1.</li> <li>○ To amend criterion b) to read “declared surplus to requirements and the loss, or partial loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities.”</li> <li>○ To explore opportunities for sharing the use of an existing site or co locate services</li> <li>○ Under clause 4 and the use of developer contributions for new and improved health and care facilities- to add supporting text that refers to the Infrastructure Delivery Plan and to Appendix D: Table D.1: Developers' contributions which sets out current requirements (in the Planning Obligations SPD).</li> <li>○ Healthy facilities and services should read ‘Health facilities and services’.</li> <li>○ Paragraph 5.2.1 defines social and community infrastructure, suggest that the second bullet should read ‘health and care facilities’ and be separated from leisure facilities.</li> </ul> </li> </ul>

Chapter or policy reference	Summary of main issues
	<p data-bbox="618 288 1133 316"><b>General bodies / other organisations</b></p> <ul data-bbox="667 347 2029 1246" style="list-style-type: none"> <li data-bbox="667 347 2029 651">• Areli for Blackrock and a consortium of landowners, suggest amended wording, stressing dialogue: “Contributions will be sought towards new school places to meet the needs arising from new housing development (excluding care homes), taking account of available capacity within existing schools and the number of pupils it will generate, from early years through to secondary education. New or expanded schools will be expected to incorporate specialist provision where demand exists and make reasonable adjustments to support the needs of the disabled and mobility impaired. In exceptional circumstances, a contribution towards off-site outdoor play space will be accepted in the vicinity of the school in lieu of on-site provision. These contributions will be captured in the dialogue between the Council and developers for the drafting of the Section 106 Heads of Terms.”</li> <li data-bbox="667 683 2029 778">• It was recommended by TfL Commercial Development to revise Sections 3 and 4 to state that contributions ‘may be sought’, rather than ‘will be sought’ as these requirements will be dependent on the specific considerations set out within each policy in relation to education and healthcare.</li> <li data-bbox="667 810 2029 1082">• Diocese of London relating to land at Jesus Church, Forty Hill noted that the Local Plan envisages the delivery of circa. 25,000 new units in the Borough and this will undoubtedly require new school facilities. As the Council considers its distribution strategy for this growth, the Diocese stand ready and willing to provide a new school or an extension to the existing on part of the land to the South of and surrounding Jesus Church. In addition to the need for a SEND school in the Borough, to enable the opportunity for the site to provide the land needed to expand schools to meet demand if it arises from housing growth, providing much needed educational facilities through expanding on the existing infrastructure which already establishes the north of the infill site.</li> <li data-bbox="667 1114 2029 1246">• Savills on behalf of Crosstree Real Estate Partners suggested that when seeking contributions towards new school places to meet the needs arising from new housing development that its best captured in dialogue between the Council and developers in the Section 106 Heads of Terms so that any contribution to new school places is appropriate for the local need.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• British Land support the objectives across the borough as a whole but note all forms of development can directly deliver this due to their scale, location or nature of use. They recommended that the intended application and interpretation of this policy in decision making is clarified.</li> <li>• London City Mission is supportive in principle but suggest that the criteria for development involving the loss or release of a community building should be expanded to include provision for whether there are alternative sites available within the local area to allow consolidation of facilities where appropriate.</li> </ul> <p><b>Wider community</b></p> <p>Residents raised objection in relation to Hadley Wood (SA45) in light of the impact on social infrastructure particularly in relation to GPs and education provision.</p>

**Table A.8:** Summary of main issues – Chapter 6: Blue and green Enfield

Chapter or policy reference	Summary of main issues
Policy BG1: Enfield's Blue and Green Infrastructure	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Lee Valley Regional Park Authority is generally supportive of this policy, particularly where measures to overcome issues of physical severance, inaccessibility and the fragmentation of spaces and habitats are identified. In particular, Policy BG1 point 2 which refers to the prioritisation of a range of future blue-green interventions including expansion of routes into the Regional Park and new continuous and publicly accessible linear parks such as Brooks Park and Edmonton Marshes which are proposed as part of Meridian Water. Reference to the “revitalisation of open spaces and leisure/recreational activities at Banbury Reservoir, Picketts Lock, Hotspur Way, Ponders End and Whitewebbs Park” under BG1 2.j. is also noted.</li> <li>• Natural England noted that various forms of mitigation are captured in table 6.1, however Natural England suggests further explore potential SANG opportunities within the borough and to work with</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>LBE to identify suitable mitigation options in the borough. Noting that the plan can be used as a vehicle to identify potential developer mitigation options around the borough. Having this sort of strategic approach to the avoidance and mitigation measures for Epping Forest SAC would help in the evidence base for the HRA to show that the quantum of housing proposed is deliverable. Currently, the identified avoidance and mitigation measures for Epping Forest SAC gives some level of risk to the deliverability of this Plan.</p> <ul style="list-style-type: none"> <li>• Natural England that LBE takes part in the discussions around the emerging Epping Forest Strategic Solution and for LBE to sign up to the updated SAMMs project once it has been agreed. Moreover, note that Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery.</li> <li>• TfL Spatial Planning is supportive of proposals for public realm improvements along main routes (e.g. A10, A406 and A101) and at key stations and town centre gateways and for new crossings/bridges over the A10, A406 and Lee Valley line to overcome east-west severance. It will be important that there is early engagement with the relevant infrastructure providers and managers including TfL.</li> <li>• TfL suggest it would also be helpful to confirm support for adoption of the Healthy Streets Approach to ensure consistency with other sections of the Local Plan.</li> <li>• The Canals and River Trust is supportive of the council's aspirations for a more integrated, multifunctional and accessible blue and green infrastructure network and to address deficiencies in quantity, quality and access across the Borough. The Trust notes that while policy BG1 supports the rewilding and naturalisation of river corridors, significant rewilding and/or naturalisation is highly unlikely to be achievable on the Lee Navigation, given its function as a navigable waterway. For the avoidance of doubt, they suggest that part g of the policy should be amended as follows (additional text underlined): protecting and enhancing existing residential moorings located on the <u>River Lee and River Lee Navigation</u>.</li> <li>• Sport England support the protection and enhancement stance in Draft Strategic Policy SP BG1, particularly in relation to a sites' function as this should prevent, for example, playing field being lost to more general open space. However, Sport England would like to highlight that private playing fields have an important role for the delivery of sport therefore these should have similar protection. It</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>should be noted that the NPPF, paragraph 99 in particular, does not distinguish between public and private playing fields and sports facilities. Draft Strategic Policy SP BG1 1. h. seeks to create and increase publicly accessible open space and outdoor sports, including playing pitches and ancillary sporting facilities, particularly in locations which experience the highest level of deficiency. Sport England support this stance and would like to highlight that the PPS would be able to direct what facilities/pitches are required and where. In relation to 2. b, the sport villages, and the facilities within them, should be informed by the PPS and other sport facility strategies to ensure that they meet identified needs. Although both Firs Farm and Enfield Playing Fields are mentioned as potential hub sites in the PPS, so could be argued the PPS steers towards a sports village of sorts, Hotspur Way is not.</p> <ul style="list-style-type: none"> <li>• Broxbourne District Council noted that Figure 6.1 (contained within a separate 'Errata Note') shows the New River as a 'green link', LBE is also proposing to create an active travel corridor along the New River to the M25 crossover, subject to funding. Broxbourne District Council is keen to progress this connection, particularly in light of the proposed film studios at Park Plaza West within Broxbourne.</li> <li>• LB Waltham Forest is generally supportive of the comprehensive approach taken in this chapter, they recommend that specific and separate policies are developed detailing how development proposals will contribute to the protection and enhancement of the Epping Forest Special Area of Conservation and the Lee Valley Regional Park. They also recommend early engagement with Natural England and the City of London (Conservators of Epping Forest) as the plan progresses through to Regulation 19 Stage. The London Borough of Waltham Forest is committed to supporting the London Borough of Enfield in developing these policies to ensure that a consistent approach is delivered in each Local Plan to mitigate the in-combination effects of air quality and recreational pressures</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• General support regarding the commitment to preserving and enhancing the natural realm, suggestion involve encouraging maximise urban greening.</li> <li>• More emphasis on joined up green links for walking and cycling, and new crossings to reduce severance.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• For the Enfield 'green loop' to also be accessible by bike, including non-standard and adapted cycles.</li> <li>• The principle of crossings to reduce east-west severance to be extended particularly to railway lines in the Borough.</li> <li>• Concerns raised regarding any use of Green Belt land for development</li> <li>• To create wildlife corridor along Monken Mead Brook with ponds, wetlands and leaky SUDS to improve the rural landscape, enhance the wildlife corridor, reduce the increasing risk of flooding downstream and improve public access.</li> <li>• Cockfosters Local Area Residents Association is supportive of LBE aspirations to protect the openness of the Green Belt (1.a.) and the 'sensitive restoration and enhancements of registered historic parks and gardens. (Trent Park...) (2.i.) Also supportive of LBE para. 6.14 which notes that the effect of this policy will extend to the management of the parks and in the light of this we would ask Enfield to review the use of Trent Park for large music festivals.</li> <li>• Lansdown Land representing Anglo Aquatic Plant Co, is supportive of the objectives set out in Policy BG1 which prioritises development that will contribute to the creation of a "more integrated, multi-functional and accessible green and blue infrastructure networks". They recognise the policy is consistent with the vision set out in Policies SP BG1- BG9. For example, Placemaking Principle 14 of Policy SP PL9 states that development at Crews Hill should incorporate "green links to the surrounding designated landscapes, for example Enfield Chase, and the National Cycle Network route 12". Anglo Aquatic falls within close proximity to key blue and green infrastructure networks, such as Enfield Chase which connects Crews Hill and Trent Park. The proposal site will benefit from restoration of this area as detailed in the Crews Hill Topic Paper, which will comprise a publicly accessible woodland, open space, sustainable movement routes and extensive rewilding. They note, effective masterplanning of the Crews Hill Placemaking Area as supported in Policy SP SS2 has the potential to protect and enhance these green and blue infrastructure networks.</li> <li>• Tottenham Hotspur Football Club supports the Plan's protection, maintenance and enhancement of the blue and green infrastructure network and the long-term vision of EC to create a green and distinct place. They noted that there is no definition within the Plan to the term "World Class Sport</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>Villages". To ensure consistency with other policies (namely, SP CL4) the Policy should be modified in its reference to the SA62 area (as proposed to be extended to include SA57) as "<u>professional and community sports, recreation and leisure facilities, including ancillary and related uses</u>" rather than "Sport Villages".</p> <ul style="list-style-type: none"> <li>• Tottenham Hotspur Football Club suggests amending of Criterion (j) where it relates to land at Hotspur Way and Whitewebbs Park. Indicating that the policy suggests that revitalisation of open spaces and leisure/recreational activities should take place in these two locations, along with other areas within the Borough. The Criterion appears to suggest that there is a need to improve open space and leisure/recreational activities in this area. The development management for these areas is contained in Site Allocation SA62 and draft Strategic Policy SP CL4. Together, the Allocation and Policy SP CL4, provide an appropriate development management approach to open space and recreation/leisure objectives for this site. They request that Criterion (j) is re moved from the Policy where it relates to SA62 (as proposed to be extended to include SA57).</li> <li>• Joanne McCartney MP described the plan as 'Positive and ambitious proposal'.</li> <li>• Thames Water from a landowner's perspective is not supportive of the Wildlife Corridor designation covering the Thames Water sites at SA55: Land to North West Innova Park and Land south of William Girling Reservoir.</li> <li>• The British Horse Society noted that several categories of public rights of way (bridleways, restricted byways and byways and minor public roads) are already shared by cyclists and other user groups. Thus, as a general principle, we believe that, for maximum public benefit &amp; fairness, the reciprocal should be implemented, i.e. that new cycle paths should be shared with other user groups unless there is a specific, unresolvable reason not to do so.</li> <li>• Cllr Anne Brown noted the need to address the pressing need to reduce pollution and/or protect/enhance green spaces.</li> <li>• The Enfield Society is supportive of aspects of the policy but concerned that the 'blue and green infrastructure network' is being used by the Council, together with the 'National Park City' concept (policy SP PL8) to justify the loss of important areas of countryside and Public Rights of Way.</li> </ul>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Better Homes Enfield is generally supportive but raise the following concerns and objections; <ul style="list-style-type: none"> <li>○ The policies themselves are open to wide interpretation.</li> <li>○ There are very few quantifiable/measurable metrics that could be used to assess a planning application.</li> <li>○ A lot of the polices are just general aims and are non-committal. They will be open to “negotiation”.</li> <li>○ Better Homes feel that, however nice these aims may sound, that in practice the policies themselves are largely meaningless.</li> </ul> </li>   <li>• City of London who act as conservators of Epping Forest, support the aspiration of LBE to become the greenest in London and believe that Enfield has the potential through its Green &amp; Blue Infrastructure Strategy to create new and improved Open Spaces within the Borough boundary.</li>   <li>• The Hadley Wood Neighbourhood Planning Forum with reference to SP BG1 – suggest that developments must ensure that “development protects and enhances significant ecological features” – how is that defined? Areas of Special Character, which includes the Hadley Wood site, must be protected. Para 6.1.5 states that “Enfield’s long-term ambition is to become the greenest borough in London”. This ambition is reflected throughout the ELP; however, the statements are entirely undermined by the proposals to build a quarter of all new housing on Green Belt land. DMD 78 – new Policy SP BG1 has materially weaker wording, as it merely requires developments to contribute to the blue &amp; green network, vs the current statement that developments along wildlife corridors will only be permitted if they protect and enhance the corridor. Similar weakening of nature conservation and ecological enhancements. Wording must be strengthened.</li>   <li>• LBE Strategic Property Service support Policies BG1 to BG11. It suggests that the policies Map (2021) designates Crews Hill Golf Course as a “Site of Borough Importance for Nature Conservation” and “Local Open Space”, as well as draft Site Allocation SA27 (Land at Crews Hill) and draft Policy PL9 (Crews Hill placemaking area). These designations relate to Policy BG2 (Protecting Nature Conservation Sites) and Policy BG6 (Protecting Open Space). LBE Strategic Property Services</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>recommend that the plan provides further information on the relationship between these proposed policies, especially as the site is proposed to come forward for strategic development.</p> <p><b>Wider community</b></p> <p>A high number of residents are supportive of the council's aim to protect green spaces and biodiversity but raised concerns about climate change and any developments to the Green Belt.</p>
<p>Policy BG2: Protecting nature conservation sites</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Lee Valley Regional Park and Pickett's Lock are identified as locations for SANG mitigation in terms of recreational pressure. The LVRPA would welcome further discussion. It will be necessary to understand the implications of the HRA Report and its recommendations for revising policy to ensure "the Local Plan provides specific guidance on the circumstances in which SANG, developer contributions and/or project level HRA will be needed, and the quantities required" and that this is referenced in policy text (paragraph 6.10).</li> <li>• The LVRPA highlights the importance to identify appropriate sites within the Park to meet the requirements of SANG mitigation and understand what this will mean for the long term management in relation to the Authority's venues and open spaces and delivery of the PDF proposals.</li> <li>• The LVRPA is concerned that the open spaces within the Regional Park, many of which are designated as part of the Lee Valley SPA, already face considerable recreational pressure from visitors and increased numbers of local residents, which makes their management for ecological objectives in accordance with these designations difficult.</li> <li>• Epping Forest District Council is unable to conclude no adverse effects on the integrity of Epping Forest SAC, as a result of recreation pressure. Mitigation for recreation pressure at Epping Forest SAC needs to be set out in the Local Plan in order to avoid adverse effects on the integrity of Epping Forest SAC.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li data-bbox="667 288 2029 384">• The Environment Agency consider that all developments should be expected to provide an ecological assessment, ensuring an ecological baseline is created, from which it can be ensured biodiversity is conserved and enhanced.</li> <li data-bbox="667 416 2029 552">• Natural England welcomes the policy and notes that only Epping Forest SAC is set out in the summary box and advises that the Lee Valley SPA and Wormley Hoddesdonpark Woods SAC should also be named, to ensure that the final Local Plan gives great weight to the protection of habitat sites. The final Local Plan should give great weight to the protection of Epping Forest SAC.</li> <li data-bbox="667 584 2029 751">• Natural England welcome the strength of the policy but considers that development is not being permitted where it would adversely affect the integrity of SPAs and SACs, unless it meets the requirements in the regulations. Natural England advises that an HRA screening is required for all sites with the Zone of Influence of a Habitat Site (SPAs and SACs) in order to comply with the Habitats Regulations.</li> <li data-bbox="667 783 2029 1150">• Natural England notes that currently the local plan only refers to developments of over 100 units in point 3 of SP BG2, this needs to better reflect the interim strategy in terms of the need for SAMM and SANG payments as appropriate. Developments in the 0-3km ZOI are required to contribute SAMM payments, and this should be made clearer. If this is only collected on major developments (&gt;10 units) to also cover the mitigation costs of minor developments, then NE is happy to agree to this approach, but it should be written up in the supporting text and HRA. Discussions around moving the interim strategy forward are ongoing. Currently the oversight group is hopeful that a governance agreement and breakdown of the SAMM tariff may be able to be brought before councils in January 2022 and we would advise that the policy may need to be amended as appropriate as these discussions develop. Natural England advises the addition of a further point to this policy stating that appropriate avoidance and mitigation measures will be secured prior to occupation.</li> <li data-bbox="667 1182 2029 1318">• Natural England agree with the conclusions of the HRA that currently the effects of the plan on air quality remain uncertain and that further information is required. It is pleased to see that the air pollution and traffic data surveys have been commissioned by Enfield Council and would be happy to discuss these once completed.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• LB Redbridge support the SANG requirements; however, it is likely that with the possible exception of the sites to be released from Green Belt land, that these sites will be incapable of providing SANG on-site; in common with the other London Boroughs within the Epping Forest SAC catchment. Table 6.1 lists those locations which can provide new or upgraded spaces to serve as SANG, supported by the Enfield Blue &amp; Green Strategy; this is supported provided such sites offer suitable recreational capacity and overall attractiveness to visitors as semi-natural spaces.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• City of London (CoL) (who act as conservators of Epping Forest) note that Zone of Influence is 6.2km, and that this Zol is to be subject to regular review through further Epping Forest Visitor Surveys. Such reviews, undertaken as part of the Competent Authorities' SAC Mitigation Strategy monitoring work, may see this Zol change. This potential for change and for regular review should be covered in the wording of the Policy, so that Policy remains sound throughout the Local Plan period to 2039.</li> <li>• CoL consider that the use of the word 'offset' in this Policy contradicts the earlier wording of mitigation and avoidance. The Habitat Regulations protect Epping Forest SAC from adverse impacts by requiring mitigation, which involves first and foremost avoidance of any impacts, as the Policy correctly highlights. However, offsetting suggests compensatory measures which would make the Policy unsound because compensation would not be acceptable without a justification under IROPI - i.e. for imperative reasons of overriding public interest. In this case, The Conservators, therefore, request that for avoidance of doubt about the Policy meaning, the word 'offset' should be deleted and replaced with the word 'prevent'.</li> <li>• CoL welcomes the wide range of proposed mitigation set out in table 6.1 but recognise there is no detail here. For the SANGS element, the scale, suitability and future management of these SANGs is not yet certain or fleshed out and, therefore, The City of London Corporation are not able to comment on the potential viability of the proposed provision. However, we are concerned about the quality and type of SANGS that may be provided for such a large, proposed increase in residential population.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• The Conservators welcomes the ambition and objectives of the Borough’s Local Plan but encourages the Borough to give further serious consideration through its HRA’s Appropriate Assessment to the impact of the Plan’s proposals on the statutorily protected area of Epping Forest.</li> <li>• The Conservators seek the opportunity to work with both the Borough and Natural England to ensure that, in the face of the development proposed under the Regulation 19 version of the Local Plan, that Epping Forest not only remains a protected landscape but that it is enhanced as part of a wider area of protected open spaces, providing quality access to nature for local people while protecting the Forest’s irreplaceable habitats and features from any deteriorations in air quality and unsustainable increases in recreational pressure.</li> <li>• The Hadley Wood Neighbourhood Planning Forum consider that the policy must also protect Areas of Special Character to ensure consistency with the NPPF paras 101 and 174.</li> <li>• LBE’s property services support this policy (BG1 to BG11) and consider Crews Hill placemaking area would bring significant landscaping and biodiversity benefits to the Borough, including biodiversity net gain. The service considers this could be achieved through carefully planned development and it would be a key component of the SPD.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Concerns were raised amongst the wider community that any development would have an impact on the local SINC’s and reduce the biodiversity and nature conservation interests particularly to Firs Farm.</li> <li>• There are concerns that development on the Green Belt will involve the massive loss of mature grassland ancient tree and hedge habitats to numerous species including Bats, Red Kites, Buzzards, Tawny &amp; Barn Owls, Deer, Hedgehogs, Woodpeckers and Foxes, and disruption to the precious but fragile environment which once lost can never be replaced.</li> </ul>
Policy BG3: Biodiversity net gain, rewilding and offsetting	<b>Specific Bodies (Statutory)</b>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• The Environment Agency is very pleased to see their concerns have all been addressed in the plan and that net gain is now a requirement for all new developments.</li> <li>• Natural England welcome the inclusion of this policy, outlining that all developments must submit an action plan evidencing how the development will achieve a minimum of 10% net gain, preferably on site.</li> <li>• Natural England note that Chingford Reservoirs have been identified in point 3 of the policy and would highlight that these are notified as an SSSI, and any improvements would have to be made in line with the regulations for this designation, and without any impact to the site and species.</li> <li>• Natural England recommends that where net gain cannot be provided on site, or feasibly as close to the development as possible, that consideration is given to developing a suite of projects across the borough/area that development within the Borough can contribute to thereby ensuring the biodiversity within the Borough is protected and enhanced.</li> <li>• Natural England considers that the Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment. A strategic approach for networks of biodiversity should support a similar approach for green infrastructure. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.</li> <li>• The Canal and River Trust welcomes riparian corridors being identified as a priority location for off - site biodiversity improvements.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Friends of Trent Country Park and Enfield Road Watch raises concern that the policy is being used to justify development that would be highly damaging to the environment. They state that there are irreplaceable priority habitats within Enfield Chase lying within a non-re-creatable historic setting. Development would destroy or fragment these important assets. No amount of developer</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>contributions to 'rewilding' or offsetting can compensate for damage to these aspects of the countryside.</p> <ul style="list-style-type: none"> <li>• Enfield Road Watch highlights that Vicarage Farm is located on the Buglife B-line (part 3c of the policy) and should be protected, rather than destroyed by development in an area great for wildlife, insects and birds.</li> <li>• Goodman Logistics Development UK Ltd supports biodiversity net gain and the potential to provide off site. However, wants to seek an element of flexibility in the context of intensification.</li> <li>• Fairview New Homes support the direction of the policy to improve access to nature. They indicate that access to nature will be provided both on the site, through the provision of open space, and new and improved linkages to open spaces within the surrounding area. As part of the landscaping strategy, native tree, shrub and flower planting will be incorporated across the site, to achieve net gains in biodiversity and provide habitats for locally important species. Whilst, Blue and green infrastructure will be integrated across the site to provide wildlife corridors for locally important species.</li> <li>• Notting Hill Genesis support the direction of the policy but considers that all major developments should be considered in light of the mitigation hierarchy (avoid, mitigate, and compensate) to protect most valuable ecological features of the site and minimise harm to nature – rather than all developments.</li> <li>• Local politicians oppose to the policy as they consider there is conflict with Policy CL4 as it identifies Firs Farm as facilitating and contributing towards developing sport and leisure facilities in Enfield, but its proposal has significant effect on SINC, reduction in biodiversity and nature conservation interest; reduce effectiveness of flood alleviation provided by Firs Farm wetlands; uncertainty into the future use of Firs Farm wetlands and jeopardises funding for projects secured by community groups.</li> <li>• The Enfield Society considers that the Council should work with their tenant farmers to secure access to these environmental government subsidies, rather than looking to force tenant-farmers away to make way for 'rewilding' projects financed by developers.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li data-bbox="667 288 2029 727">• The Enfield Society notes that the ‘errata note’ removes reference to the Bug Life B-Line from the policy as a minor modification. They indicate that the Buglife B-Line corridor is a network of ‘insect pathways’ where wildflower-rich habitat will be restored and created to connect existing wildlife areas, which will be of benefit to insects. It is of significance for birds and species that rely upon insects for food. It believes this is why bird sightings, including skylarks, have been so frequent over the fields near Trent Park at Vicarage Farm. It believes the removal has significant implications for draft Policy CH10: Chase Park. This is because the Review of Sites of Importance for Nature Conservation (2021) identifies that the Vicarage Farm and Rifles Site Borough- Wide Site of Importance for Nature Conservation (SINC – LUC site ID30, SINCID ENb15) is connected with the SINC’s at Trent Park by ‘similar’ habitat (see the Review, Appendix C, PDF page 14). LUC identify the ‘strategic’ importance of the wildlife site ‘given its location’. Trent Park and Vicarage Farm essentially comprise one large area of strategic wildlife habitat. Suggest that the BugLife B-Line should be reinstated to the policy and clearly shown on the mapping.</li> <li data-bbox="667 759 2029 855">• The Hadley Wood Neighbourhood Forum consider that the policy is significantly weaker than the London Plan which, in para 8.6.6 states that “this approach does not change the fact that losses [of biodiversity] should be avoided and biodiversity offsetting is the option of last resort”.</li> <li data-bbox="667 887 2029 1015">• LBE’s Property Services support the direction of the policy and consider this could be achieved through carefully planned development and it would be a key component of the SPD and recommend that the plan provides further information on the relationship between policies SA27, PL9, BG2 and BG9, especially as the site (SA27) is proposed to come forward for strategic development.</li> </ul> <p data-bbox="618 1046 864 1078"><b>Wider community</b></p> <ul style="list-style-type: none"> <li data-bbox="667 1110 2029 1278">• Broad support received from the wider community with suggestions to include relatively small features, such as incorporating swift bricks and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat, can often achieve important benefits for wildlife. These should follow best practice guidance in accordance with the London Plan, Policy G6 (4) and in line with the guidance in NPPG Natural Environment Paragraph 023.</li> </ul>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Residents welcomed the proposed environmental improvements which address climate change and biodiversity</li> <li>• There was concern that not all habitats can be re-created.</li> <li>• It was noted that Vicarage Farm is deficient of biodiversity and suggested that the council could work with the existing tenant farmers to enable them to take advantage of Government subsidies for rewilding. This would be preferable to building a housing estate over farmland and then the developers creating "rewilding projects".</li> </ul>
Policy BG4: Green Belt and Metropolitan Open Land	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No points raised by specific bodies regarding this policy.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The North West London RSPB Group objects to the policy as the Green Belt attracts many low impact visitors (not just local residents) to the area especially those seeking to enjoy the open farmland atmosphere in largely unspoilt countryside. They indicate that the Politicians now have the chance to prove that the Green Belt is “safe in their hands”.</li> <li>• Lansdown Land representing Anglo Aquatic Plant and land at Theobalds Park Road support the general position of this policy that states that Enfield’s Green Belt and Metropolitan Open land should be protected from inappropriate development that would have a detrimental impact on openness and character of its surroundings.</li> <li>• TfL Commercial Development does not support Section 2 of Draft Policy SP BG4 which allows for development within the Green Belt and on Metropolitan Open Land where there is no significant detrimental impact on their openness, and the character of their surroundings is respected. As per Policy G2 of the London Plan, Enfield’s Green Belt, ‘Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan’.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• TfL Commercial Development recommend Enfield’s draft policies be amended so as to explicitly preclude development within the Green Belt. Equally, Policy SP BG4 should actively encourage and advocate the use and optimisation of brownfield sites within the borough to mitigate the need for Green Belt development.</li> <li>• The Hadley Wood Neighbourhood Planning Forum object to development in the Green Belt, indicating that SA45 should not be released for development. Enfield’s Green Belt and MOL Study indicates that the site: 1) contributes to purposes and openness of the Green Belt; 2) merits continued protection 3) assessments conclude that Hadley Wood makes a ‘strong’ contribution to the Green Belt; and 4) assists in safeguarding the countryside from encroachment.</li> <li>• LBE’s Property Services support the direction of the policy and consider this could be achieved through carefully planned development and it would be a key component of the SPD and recommend that the plan provides further information on the relationship between policies SA27, PL9, BG2 and BG9, especially as the site (SA27) is proposed to come forward for strategic development.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Crews Hill Golf Course objected to this policy and consider the golf course is a major part of north Enfield, provides the opportunity for all members of the public to improve both their physical and mental health and should not be considered for development.</li> <li>• The wider community objected to the release of Green Belt for development and considered that development will spoil the countryside, resulting in a loss to habitats, greenery and views.</li> </ul>
Policy BG5: Green Belt and edges of the countryside/urban areas	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Lee Valley Regional Park Authority welcomes this policy and its links with draft Policy BG2 which allows for the partial or complete redevelopment of previously developed sites in accordance with restrictions in terms of the impact on the openness of the Green Belt and increases in traffic generation. However, it was noted in their representation that the draft Policies Map does not indicate the designated area of the Pickett’s Lock major developed site. The current draft Policies Map shows only the Site Allocation SA56 keyed on the map as ‘Preferred Option for Spatial Growth</li> </ul>

Chapter or policy reference	Summary of main issues
	<p data-bbox="712 284 2018 619">Sporting/Leisure’ and which covers a portion of the site relating to the car park and cinema and does not for example include the camp site, athletics centre or site of the previous leisure centre. The LVRPA wants a much greater emphasis within the Local Plan on the strategic importance and potential of Pickett’s Lock in the eastern part of the Borough. Following an initial Duty to Co-operate meeting the Authority would wish to discuss this point in further detail and it has been agreed that a revised site allocation for Pickett’s Lock will be provided that better reflects the Authority’s ambitions for the site in accordance with the Park Development Framework Area Proposals and current joint working on The Wave London project. Likewise, Council officers will be advising on the ‘missing’ Policies Map notation for major developed sites in the Green Belt, which should apply to Pickett’s Lock. The Authority may wish to comment further on this point in due course.</p> <ul data-bbox="667 651 2029 1345" style="list-style-type: none"> <li data-bbox="667 651 2029 751">• Hertfordshire County Council is concerned about the commitment to parking provision in this policy. This seems contrary to the commitment to sustainable transport set in other policies, and the aim of achieving 80% sustainable modal share.</li> <li data-bbox="667 783 2029 847">• TfL Commercial Development maintain objections to this policy in a similar vein to their objections set out at policies BG4 and SS1.</li> <li data-bbox="667 879 2029 1182">• Tottenham Hotspurs Football Club, support the identification of land at Hotspur Way (site allocation SA62, as proposed to be extended to include SA57) as “major developed site” given it comprises substantial areas of previously developed land. It appears to suggest in the text that future development will only be countenanced where existing uses become redundant and, therefore, does not consider development proposals that are in addition to existing functions of the area. THFC respectfully request that this aspect of the Policy is clarified, and that it is made clear that the MDS designation applies to further development at the SA62 site, and not only in cases where the existing uses become redundant. However, it considers it unnecessary, for those cases where further development is proposed for a planning brief or masterplan to be prepared.</li> <li data-bbox="667 1214 2029 1345">• THFC and D&amp;J London Property Ltd considers whether there should be separate policy covering MDS or whether there be a specific reference to MDS in Policy BG5 and applied to further development not only where the site is redundant. However, THFC consider it is not necessary that in those cases where further development is proposed that a planning brief or masterplan is required.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• D&amp;J London Property Ltd point out the guidance for the future use of 'previously developed land' in paragraph 6.5.3 in the 'Explanation' supporting policy BG5. This states that 'Limited infilling or the partial or complete redevelopment of previously developed land and temporary accommodation will not be inappropriate subject to meeting the criteria set out in parts 2 and 3 of the policy.' Such guidance should apply equally to land in the MOL that has been previously developed such as the site at 144 Firs Lane.</li> <li>• The Wave, consider the requirement set out in BG5 2 b ("...not lead to an increase in the developed proportion of the site...") is not consistent with NPPF para 149 g and should be removed. Criterion 3 (traffic impact) should be dealt with under other policies related to the assessment of development proposals and not added as a further criterion to this part of policy BG5. Also, Picketts Lock referred to as a Major Developed Site (6.5.5) - this terminology dates from PPG2. NPPF uses the terminology of Previously Developed Land.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Cockfosters Local Area Residents Association notes that the policy only covers 'development in the Green Belt' but considers that it should cover 'development that affects the Green Belt' as well, in line with existing policy DMD83, London Plan policy G2 and NPPF para 144.</li> <li>• The Hadley Wood Neighbourhood Planning Forum considers that the requirement for Green Belt developments to provide 50% affordable housing, which they indicate by definition comprises higher density and lower cost builds, conflicts with SP BG5, which requires the siting, scale, height and bulk of developments adjacent to the Green Belt to be compatible with the primary aim of preserving the openness of the Green Belt, with high standards of design and landscaping. They also consider that para 6.5.1 of the plan is looser than or inconsistent with the NPPF wording. For example, Enfield state that some Green Belt development that is not inappropriate "includes some forms of development on previously developed sites, limited infilling within existing settlements". NPPF para 149.g) specifies that such developments must "not have a greater impact on the openness of the Green Belt than the existing development, or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need".</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• LBE Property Services support the direction of the policy and consider this could be achieved through carefully planned development and it would be a key component of the SPD and recommend that the plan provides further information on the relationship between policies SA27, PL9, BG2 and BG9, especially as the site (SA27) is proposed to come forward for strategic development.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Residents highlight the importance to have a Green Belt in London and recognise its importance for wildlife, mental wellbeing and future generations</li> <li>• Objections were received recognising that the Green Belt must be protected and conserved in North West Enfield and Cuffley Brook and the land up to Burnt Farm Ride where it serves vital purposes including separation from Barnet and Potters Bar, helping air quality in the borough and biodiversity.</li> </ul>
Policy BG6: Protecting open space	<p>Comments related to Policy BG6 were received from local organisations and the wider community. They note the importance of Open Space and its benefits to the borough. However, contradictory concerns have been raised relating to how the policy would either support or restrict back garden development coming forward.</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• None noted.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• LBE Strategic Property Services support this policy.</li> <li>• The Hadley Wood Neighbourhood Planning Forum object to garden development being permitted with mitigations, the concern relates to the policy wording permitting all garden development that may come forward.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Noted Parks, golf courses, open spaces are vital for human welfare, health benefits and leisure for all.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Green spaces are valuable, especially to people living in flats with no gardens.</li> <li>• Objection as the policy would restrict development of homes in back gardens. This policy completely undermines council's own policy (Policy DM H4) of permitting 'incremental, sustainable intensification' on small sites. Proposals for development in garden land should always be fairly assessed on their own merits.</li> <li>• Objection as the policy introduces uncertainty into the future use of Firs Farm wetlands that jeopardises funding for projects secured by local community groups (e.g. from Thames Water) that have been endorsed and supported by Enfield Council.</li> </ul>
Policy BG7: Watercourses	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Lee Valley Regional Park Authority is supportive of the aspiration for the enhancement of the river and to encourage the public connection to the waterways, however the need for space for nature should not be overlooked. Within emerging designs, refuge or quiet areas should be incorporated to enable species with a large home range, such as otter to both move through and rest up. Similarly, for species such as Water Vole to colonise and establish territories, breed and thrive there is a need for undisturbed areas. Concern remains however about the demands policy is potentially placing on the waterways within this area – the waterways are identified in policy as part of the public realm, a focal point for cultural activity, with access routes alongside, and an important ecological resource. Bullet point 11 proposes the Lee Navigation as a venue for water sports facilities. Further thought should be given to the primary role of the waterways and how the various demands can be balanced. There is a similar concern in respect of the detail of Policy BG7 'Watercourses'.</li> <li>• The Canal and River Trust indicate that policies do not generally support online permanent moorings, with a preference for offline mooring, moorings in laybys or basins. However, in their view, there may be locations where online moorings are appropriate if they satisfy the criteria of the trust's Online Mooring Policy. Amongst other things, permanent online moorings may make a valuable contribution to public enjoyment of the waterways, natural surveillance and the character of an area, including within regeneration areas that span a Trust waterway, such as Meridian Water. We suggest that, at the Local Plan stage, it would be premature for online moorings to be ruled out to the extent that they</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>are by policy BG7. Point 3 of the policy should be amended to require moorings to not have adverse impacts against a range of appropriate criteria (such as those already included) but it should not seek to specify a location in relation to the main channel.</p> <ul style="list-style-type: none"> <li>• Sport England welcomes that sport and recreation activities within or adjacent to watercourse would be supported in Policy DM BG7.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The Enfield Society is concerned that the Council's approach to rewilding in Policy BG3: biodiversity net gain, rewilding and offsetting could force the Council's tenant farmers off the land. A more effective approach to biodiversity enhancement in Enfield Chase would be to work with the tenant farmers to encourage best practice in agri-environmental management, for example in the approach to crop rotation, reduction in the use of chemical fertilisers and pesticides, and allowing field margins to flourish. A further benefit of this approach would be that it would not require financial contributions from developments in the Green Belt countryside.</li> <li>• Landowners support Policies BG1 to BG11 and consider Crews Hill placemaking area would bring significant landscaping and biodiversity benefits to the Borough, including biodiversity net gain. We consider this could be achieved through carefully planned development and it would be a key component of the SPD.</li> <li>• The Hadley Wood Neighbourhood Planning Forum Policy note DM BG 7 does not differentiate between the different types of watercourses. Greater protection should be provided to Main Rivers versus, for example, Ordinary Watercourses.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• None noted.</li> </ul>
Policy BG8: Urban greening and biophilic principles	<b>Specific Bodies (Statutory)</b>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• The Lee Valley Regional Park Authority is supportive of this policy which seeks to maximise opportunities to green the borough’s urban and more rural environment, including the Regional Park. Noting that the plan acknowledges measures such as green/brown roofs, living walls, trees and soft landscaping treatments, will have multiple environmental benefits for biodiversity, flood mitigation, urban cooling as well as improve the quality and aesthetic value of the area if appropriately implemented and maintained over time.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Social Housing Plus – Fore Street Limited (c/o DP9 Ltd) raise a concern that the plan has a several competing factors around site landscaping (including playspace, cycle parking, resident’s amenity areas) in practice this is unlikely to be achievable unless you are dealing with large masterplan sites which have the space to consider this policy. Rather than ‘expect’ the text should be updated to ‘encouraged’.</li> <li>• Connected Living London (Arnos Grove station car park) raise an objection noting that the Policy does not meet the need for sustainable growth in the area NPPF para 11: Sustainability test. As well as the NPPF para 35: Soundness test - the Policy does not meet the tests of soundness.</li> <li>• Connected Living London considers that to ensure that the policy is deliverable and effective, proposed modification suggested that part 1: New development will need to demonstrate how it will exceed target the urban greening factor targets set out in the London Plan... London Plan Policy G5 requires Boroughs to develop an Urban Greening Factor (UGF) to ‘identify the appropriate amount of urban greening required in new developments’. It requires the UGF targets to be ‘tailored to local circumstances’. No evidence has been provided that would support a higher recommended target than that set out in the London Plan. The policy should be amended to align with London Plan Policy G5 Urban Greening Factor targets.</li> <li>• TfL Commercial Development supports the aspiration to exceed London Plan targets in relation to the urban greening factor as set out in Section 1 of Draft Policy DM BG8 and will seek to exceed this target wherever possible. However, they recommend the inclusion of a caveat which states that this should be achieved where viable and subject to site constraints. Draft Policy DM BG8 should accord with London Plan Policy DF1, which sets out that ‘applicants and decision-makers should firstly apply</li> </ul>



Chapter or policy reference	Summary of main issues
	<p>priority to affordable housing and necessary public transport improvements' and the priorities set out in Section D of the policy.</p> <ul style="list-style-type: none"> <li>• Origin Housing suggest that 'All major development will be encouraged to exceed the urban greening factor targets set out in the London Plan and to show how the green features will be maintained throughout the life of the development in line with the principles of biophilic design. Reference should be made to circumstances where urban greening factor London Plan targets cannot be met and how suitable mitigation, where necessary, is applied.</li> <li>• SEGRO suggest amending the policy to align with the requirements set out in the London Plan or be amended to provide more flexibility and state "Where appropriate, New development will need to demonstrate how it will exceed the urban greening factor targets set out in the London Plan...".</li> <li>• Notting Hill Genesis suggested that wording of 'development' is replaced with '<b><u>all major development will be encouraged to</u></b>' exceed the urban greening factor targets set out in the London Plan and to show how the green features will be maintained throughout the life of the development in line with the principles of biophilic design. Reference should be made to circumstances where urban greening factor London Plan targets cannot be met and how suitable mitigation, where necessary, is applied.</li> <li>• British Land note that Part 2 - lists priority areas but does not detail how these will be achieved. Detail needed to comment on the policy. Part 3 b - welcome the inclusion of the wording 'subject to viability and other planning considerations.' Part 3 c - recommend that the word 'maximised' is replaced with 'optimised.'</li> <li>• The Hadley Wood Neighbourhood Planning Forum note that DMD 80 – new Policy DM BG8 has materially weaker wording, as it merely says that developments that involve harm to trees will be "resisted", as opposed to the current "refused".</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Many residents are supportive of plan's aspiration in planning for green space and woodlands where they are most needed to address health and social inequalities in the east of the borough in the form of "tiny forests" e.g. in existing parks and playing fields (e.g. Durrants, Jubilee, Albany, Bullsmoor</li> </ul>

Chapter or policy reference	Summary of main issues
	Lane, Bellmore playing fields, school playing fields, in the two new small parks (Edmonton Marshes and Brooks) or as a continuous swathe across Lee Valley to Epping Forest.
Policy BG9: Allotments and community food production	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• NHS Healthy Urban Development Unit welcome paragraph 6.9.2 which states that where a health impact assessment (HIA) is required, consideration should be given to how the development will support access to green space, exercise and healthy food, but suggest this requirement should be moved to BG1.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Enfield Climate Action Forum cast doubt on the description of Enfield as ‘a leading centre in the development of sustainable food production and horticulture.’</li> <li>• LBE Strategic Property Services support this policy</li> <li>• British Land raise issues of practicality if the requirement to promote food production in new development is applied to industrial developments.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• One respondent highlighted a site (Broomfield Park stable yard) as a potential site for food production.</li> </ul>
Policy BG10: Burial and crematorium spaces	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency support the principles of the policy but would like to see this section of the plan expanded to promote relevant guidance, particularly Section L (cemetery developments) of the Environment Agency’s Approach to Groundwater Protection, and Cemeteries and burials: groundwater risk assessments.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Sport England objects to the loss of playing fields which the PPS states requires protection.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Bush Hill Park Residents Association, Cockfosters Residents Association, Winchmore Hill Residents Association, CPRE London, Friends of Firs Farm, LBE's Conservative Group, Enfield Road Watch, Better Homes Enfield, Southgate District Civic Voice, The Enfield Society – object to Policy BG10 as it proposes recreation grounds to be changed to burial uses. Recreation is an important contribution to a healthy life-style and reduces the costs to the local health system. Additionally, these proposals appear contrary to Policy DM CL5 (page 280) which (point 2) states Development proposals that result in the loss of sports and recreational buildings and land will be resisted unless: a. an assessment has been undertaken which has clearly shown the facilities to be surplus to requirements; or b. the loss resulting from the proposed development would be replaced by equivalent or better provision in a suitable location; or c. the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</li> <li>• CPRE London does not support Option F (preferred option) in the plan to meet objectively assessed need in the urban area and new sites in the borough. The option would involve the allocation of three public parks / open spaces / recreation grounds for burial – these sites perform an important public amenity function and should continue. CPRE suggest it would be better to allocate an appropriate Green Belt site (for example the 'Land opposite Enfield Crematorium') where burial is an appropriate use, providing openness is retained. The three sites currently proposed as allocations for burial – Alma Road Open Space, part of Firs Farm Recreation Ground and Church Street Recreation Ground – are all providing important public amenity and should be safeguarded for future to ensure green space standards and sports pitch requirements can be met now and in future, given population is set to increase.</li> <li>• CPRE London indicate that Table 6.4 of the plan does not mention loss of amenity in relation to the proposed allocations of the three parks. No 'cons' are listed at all. A better alternative would be site SA44 (Land opposite Enfield Crematorium) which currently provides no public amenity but is Green Belt and so should not be allocated for development as currently proposed.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li data-bbox="667 288 2029 587">• Friends of Firs Farm raises their concern that the development of a crematorium at Firs Farm and its operation will all reduce the effectiveness of the work done to date, and will therefore reduce the value of the significant investment of money, time, other resources and good will that the various partners working at Firs Farm have put into the project to date. By designating the area for burial/crematorium use, the longer-term future of the community hub proposal is seriously in doubt. As a result, the funding already secured from third parties is likely to be lost, and the time and resources expended in development the proposal to date will have been wasted. It seems likely that third party funders such as Thames 21 may have their confidence in Enfield Council as a trusted partner undermined.</li> <li data-bbox="667 624 2029 855">• Friends of Firs Farm indicate that the proposed cremation/burial use at Firs Farm does not constitute the very special circumstances to warrant development on MOL. Although cemeteries and burial grounds are identified as not inappropriate on Green Belt/MOL (Paragraph 149 (b)), crematoria are not specifically mentioned, which relates to the regulation of the cremation of human remains under the statutory Local Air Pollution Prevention and Control (LAPPC) regime. The draft Local Plan also has provided little or no evidence to support the inclusion of this proposal, either in terms of its need or how the site at Firs Farm was identified and evaluated in relation to other options.</li> <li data-bbox="667 892 2029 1190">• Friends of Firs Farm highlight that while the provision of crematoria is not specifically referenced in the NPPF, the most recent Government review of policy concluded that the restrictions in the 1902 Cremation Act remain appropriate to protect neighbouring dwellings and the sanctity of memorial grounds. The 1902 Act (§5) states that no crematorium shall be constructed nearer to any dwelling-house than two hundred yards, except with the consent, in writing of the owner, lessee and occupier of such house, nor within fifty yards of any public highway. The site indicated in the draft Local Plan is situated less than 200 yards from dwellings in Barrowell Green. It is also adjacent to the public highway at Firs Lane. The proposal is therefore not consistent with national policies and legislation in these respects.</li> <li data-bbox="667 1227 2029 1351">• Friends of Firs Farm highlight that the proposals for a crematorium at Firs Farm recreation ground is not in line with the London Plan (Mar-16). Specifically, the proposals are not in line with Policies GG3, S1, S5 and G3. Cremation is not specifically identified in the NPPF or London Plan as a use that is not inappropriate on MOL. It considers that the Council has also failed to demonstrate that this</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>proposal would constitute the very special circumstances necessary for this proposal to be identified in the Local Plan and/or granted planning consent.</p> <ul style="list-style-type: none"> <li>• Friends of Firs Farm indicate that the Burial needs assessment does not discuss cremation capacity in any respect, nor does it mention the use of land at Firs Farm for burial or cremation. There is therefore no connection between the policy set out in the draft plan and the evidence base that is supposed to support it.</li> <li>• Friends of Firs Farm considers that the IIA does not properly consider the ecological and flood prevention role of Firs Farm when compared with Church Street Recreation Ground. This is also not consistent with the assessment of cumulative effects presented in Table 7.4 of the IIA document, which identifies differential effects for the two proposed sites in terms of flood risk.</li> <li>• Overall, local interest groups consider that the council has failed to demonstrate either the need for additional cremation capacity in the borough or that, even if such need exists, the proposed site at Firs Farm identified in the draft Local Plan is an appropriate place or the best option available when compared with the available alternatives.</li> <li>• Cockfosters Residents Association questions why Trent Park cemetery is not included in Table 6.3.</li> <li>• Local residents' association raises concerns about the allocation as a site for a crematorium, with no recognition in the Local Plan of its ecological and community significance; especially as there are plans to build a community hub on this location.</li> <li>• Several local interest group and local politicians indicate that the proposal will significantly affect the local Site of Interest for Nature Conservation, and reduce the biodiversity and nature conservation interest of Firs Farm wetlands, contrary to several other policies in the draft Local Plan.</li> <li>• LBE property services support the policy and consider the site could offer potential to provide landscaping and biodiversity benefits to the Borough, including biodiversity net gain through carefully planned development.</li> </ul> <p><b>Wider community</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• A number of residents used a proforma response which emphasised that the recreation grounds make a positive contribution to wellbeing and health and this has a positive benefit to the local health system, which should not be used for burial and/or cremation space</li> <li>• There was also concern that the development would negatively impact the SINC and negatively impact biodiversity, and reduce the effectiveness of flood alleviation provided by the wetlands. Adverse impacts to traffic and the environment generally were also raised as issues.</li> <li>• Whilst the wishes of various faith groups are respected, the wider community felt that the idea of using undeveloped land in the Green Belt as additional burial space is unnecessary and considered making more intensive use of space in existing sites and encouraging families to use crematorium is far preferable.</li> <li>• Residents felt that there are quite a few crematoria in north London and empty warehouses on the North Circular Road and M25 areas that the council could consider exploring instead of the sites in the plan.</li> </ul>
Policy BG11: Blue and green infrastructure plans	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Natural England is generally supportive of the inclusion of Blue and Green Infrastructure as its own policy (Policy BG1 and BG11). Noting that a strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 179 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery.</li> <li>• The Canal and River Trust mention the need for major planning applications to submit a blue -green infrastructure plan to demonstrate how the development will contribute towards delivering priorities of the Blue and Green Strategy.</li> </ul> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• The Canal and River Trust is supportive of the need for major planning applications to submit a blue - green infrastructure plan to demonstrate how the development will contribute towards delivering priorities of the Blue and Green Strategy.</li> <li>• A high number of developers are not supportive of submitting a blue &amp; green infrastructure plan alongside major planning applications, noting that it's not requirement of London Plan.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No specific comments</li> </ul>

**Table A.9:** Summary of main issues – Chapter 7: Design and character

Chapter or policy reference	Summary of main issues
Policy DE1: Delivering a well-designed, high quality and resilient environment	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Metropolitan Police Service – in relation to designing out crime, are generally supportive of this policy area but suggest that para 7.1.4 appears in a box and to adjust following wording as follows: `The Council will consult the Metropolitan Police on all applications involving major development. In areas with high crime rates, achieving Secured by Design certification may be required as a condition of planning consent. Applicants should consult with the Metropolitan Police designing out crime officers at the earliest opportunity and include details of security and secured by design compliance on the Design and Access statement. Where a conflict exists between Secured by Design principles and other urban design objectives, applicants must explain their reasoning behind the compromises made in their design and access statement.</li> <li>• Sport England suggest adding to the supporting text (for example paragraph 7.1.2), a reference to incorporating the Active Design Principles within proposals so that developers are aware of requirements of Strategic Policy SP SC1.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Historic England is generally supportive of this policy area, note that the reference to public realm in the first sentence is potentially confusing, as it would appear the policy is intended to cover all new development in the borough rather than simply that relating to public realm.</li> <li>• Hertfordshire County Council is fully supportive this policy and Enfield’s prioritisation of people over private vehicles, which aligns to our vision in LTP4.</li> <li>• TfL Spatial Planning is supportive of the emphasis on high quality design led interventions in the public realm including references to movement in part 2d and public spaces in part 2f. However, suggest that it would be helpful to confirm support for adoption of the Healthy Streets Approach to ensure consistency with other sections of the Local Plan.</li> <li>• LB Waltham Forest is supportive of the approach taken to secure high-quality and well-designed development in the borough in the plan period in line with the NPPF. We are pleased to see that a thorough approach has been taken to the strategy surrounding taller buildings and the addition of the London Plan definition provides clarity on this matter. Also pleased to see clear policy setting our amenity space for new development.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• General support from developers/landowners on the requirements of draft Policy SP DE1 which seek to achieve the principles of high quality design set out in the NPPF and London Plan.</li> <li>• Connected Living London (Arnos Grove station car park) suggest that Sites (A and B) at Arnos Grove should be designated as areas of ‘transformative change’ to ensure consistency with other parts of the draft ELP. Noting that policies SP DE1, SP DE4 and SP DE6 do not meet the need for sustainable growth in the area and do not meet the tests of soundness.</li> <li>• TfL Commercial Development recommend that LBE consider the significance and pertinence of innovation within Draft Policy SP DE1. Facilitating innovation permits the delivery of infrastructure, homes and commercial floorspace that remains sympathetic to the context and locality, as well as introducing creativity and diversity within the streetscape. TfL CD therefore recommend Enfield</li> </ul>



Chapter or policy reference	Summary of main issues
	<p>integrate a further characteristic of well-designed places, ‘innovation’, particularly within areas designated as ‘transformative’ in Figure 7.1.</p> <ul style="list-style-type: none"> <li>• TfL Commercial Development commented on Figure 7.1 that Site A of the Cockfosters allocation (SA31) is designated as an area where a ‘Transformative’ level of change would be appropriate, whereas Site B is not. They request that both Sites A and B are collectively identified as appropriate for ‘Transformative Level of Change’ in order to provide substantial support for the development site as a whole.</li> <li>• TfL Commercial Development recommend that Arnos Grove (identified by draft site allocation SA24) be amended from a ‘Medium’ to a ‘Transformative’ level of change, given Arnos Grove’s allocation which is identified to be suitable for tall buildings.</li> <li>• City of London the conservators of Epping Forest – is supportive of SP DE1 section e and f, in relation to nature and public spaces as part of delivering a well-designed, high quality and resilient environment. But suggest reiterating the importance of this for the well-being of Enfield’s residence and as in Borough source of recreation.</li> <li>• The Hadley Wood Neighbourhood Planning Forum note that Enfield’s Characterisation Study (2011) explicitly refers to the fields as: “Although a small area within the borough, this landscape character area is part of an important area of Green Belt and is in good condition. The Green Belt area is clearly defined by Bartram’s Lane and the rear boundaries of properties on Camlet Way, Crescent West.”</li> </ul> <p><b>Wider community</b></p> <p>A number of residents are supportive of development of high-quality buildings and public realm but suggest more rigorous design policies, including greater requirements in relation to public realm, specific policy requirements for proposals that involve tall buildings and mechanisms by which developers can be held to account on design quality at both planning and implementation stage.</p>
Policy DE2: Design process and design review panel	<b>Specific Bodies (Statutory)</b>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• NHS London Healthy Urban Development Unit supports the collaborative approach to infrastructure planning as set out in the policy and paragraph 15.3.1. Paragraph 15.3.2 refers to the Infrastructure Delivery Plan (IDP). The latest draft IDP (June 2021) identifies healthcare projects and priorities, including those new primary healthcare facilities identified in the site allocations. The CCG would welcome the opportunity to update the latest IDP to ensure that it reflects current provision, the NHS strategic context and estate priorities.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• A number of developers indicate that this policy conflicts with Strategic Policy SP SS2 which sets out that the Council will ensure that development is planned and implemented in a coordinated way in the identified placemaking areas, guided by Masterplans. Pending the preparation of and adoption of Masterplan SPDs for the identified placemaking areas and Borough-wide design guide, proposals for major development will be considered on the basis of good growth principles and policies included in this plan and the London Plan.</li> <li>• The Enfield Society agrees with the principle of masterplanning to achieve comprehensive development, but question whether it is adequate to leave all masterplanning to the planning application stage. Some degree of masterplanning should be frontloaded onto the plan-making stage and subject to examination rather than deferred. The Society expects to see considerably more detail of emerging sites at the Regulation 19 stage because the indicative sketches provided in Appendix C to the draft Local Plan are inadequate to form a reasonable judgement as to expectations of design quality and layout.</li> </ul> <p><b>Wider community</b></p> <p>No comments noted related to this section.</p>
Policy DE3: Inclusive design	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Highways England note that they are interested in the potential traffic impacts of any development site proposals and/or policies coming forward, and the need to ensure that these are fully assessed during the plan-making stage. It is also imperative to identify any improvements needed to deliver</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>aspirations at this early stage, as set out in Government policy. Paragraph 18 of the DfT Circular 02/2013 states that 'capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage'. Additionally, Highway England would expect necessary SRN improvements to have already been identified and tested as part of the cumulative assessment of the Plan. It should identify the provision of infrastructure at the right time to support the development strategy, combined with developer contributions to secure infrastructure provision as part of an Infrastructure Delivery Plan (IDP). As such, as site allocations later come forward as part of the planning application process, they will be expected to proceed in line with the necessary highway improvements identified as part of IDP strategy. This being the case, the only issues for consideration as part of a planning application submission, would be the phasing of the development in relation to the IDP strategy. Highways England would make use of Grampian conditions to ensure that necessary infrastructure is in place prior to or phased in relation to the development becoming operational. This will be necessary to ensure operation and safety of the SRN.</p> <ul style="list-style-type: none"> <li>• Hertfordshire County Council indicated that the Draft Infrastructure Delivery Plan is noted as a document to guide infrastructure provision, identifying the different types of infrastructure that will be required to meet future growth needs of Enfield, along with delivery and phasing, which will be further developed during the next stage of Local Plan production. As a service provider within Hertfordshire, the county council would be keen to engage in discussions regarding infrastructure projects particularly those close to the administrative border.</li> <li>• Hertfordshire County Council noted that from an education perspective, it is accepted that there is an element of cross boundary movement of children across administrative borders, especially at secondary school age where children travel further to school. However, Hertfordshire in its capacity as education authority is working hard to ensure there are sufficient school places to support the development within the county and as such would not be able to accommodate significant numbers of influx into the county. HCC would be keen to engage in consultations in relation to education to identify any education demands and strategies to manage this and ensure sufficient capacity within schools and any mitigation measures required by the education authority. This is particularly</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>important in relation to Cuffley which is one of the nearest towns to Crews Hill, where primary school mitigation for the additional growth planned in WHBC is expected to be pushed to its uppermost limit.</p> <ul style="list-style-type: none"> <li>• National Grid noted that the local distribution network operator is responsible for operating the local electricity distribution network which supplies electricity from the national electricity transmission system direct to sites and premises. If new infrastructure is required in response to an increase in demand across the local electricity distribution network the operator may request improvements to an existing National Grid substation or a new grid supply point. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to sites and premises. The website below includes a map showing the distribution networks and their regions.</li> <li>• Affinity Water noted, most of the proposed development areas sit within Thames Water’s supply area and therefore they are best placed to make comments in those instances. The potential allocations within Affinity Water’s supply area are generally relatively small in scale, and we do not foresee any significant issues in relation to water supply. However, it is necessary to highlight that nearby Local Authorities are projecting a significant increase in demand which can influence the nature and pace of planned infrastructure required in the area for future growth. For this reason, we strongly encourage early engagement on plans for future development, to ensure we can effectively plan for the impacts of the associated increase in demand. All projections of infrastructure capacity are subject to developers and customers reducing their Per Capita Consumption (PCC) in accordance with its Water Resources Management Plan (WRMP) through the development of water-efficient buildings; and encouraging customers to save water (please see Water Resources section below).</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The Enfield Society suggest the level of infrastructure required to support the very high levels of growth proposed can be delivered without further harm to the character of the borough. The Regulation 19 (pre-submission) consultation should be of 12 weeks’ duration in order to allow for adequate scrutiny of that complex evidence.</li> <li>• LB Redbridge is supportive of the provision of the infrastructure identified in the draft Infrastructure Delivery Plan. It notes the current uncertainties about Crossrail 2. The plan makes appropriate</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>reference to it and it is clear the borough would benefit; however, the plan correctly avoids placing undue emphasis on this proposal.</p> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• A number of residents indicated that more literature is needed regarding infrastructure to support new home, together with increased school provision and access to medical services.</li> <li>• Some residents noted that the consultation does not describe how sewage, electricity, gas and communications networks will have to be developed and enhanced in order to accommodate the extra housing and the impact that this will have on the borough of Enfield due to the large-scale Civil Engineering and general construction works that will be required as a result.</li> </ul>
Policy DE4: Putting heritage at the centre of place making	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Historic England is generally supportive of DE1 and DE4 but noted that consider there are further work to be done in the Plan's preparation to ensure it provides a positive strategy for the historic environment and indeed that it conforms with national and regional policy in this respect. While we note the logic as set out in relation to strategic policies for the various places across the borough (and the site allocations within these places). They are concerned that there has not been adequate assessment of the potential effects on the significance of important designated heritage assets before the principle of the development specified at these locations is established. This concern relates to allocations both in the green belt and within urban and town centre locations. The most important example of the shortcomings of this approach within the Plan relate to the proposed development at Chase Park. A number (although not all) of the heritage assets likely to be affected have been identified and referenced both within policy PL10 and the site allocation pro forma. However, it is unclear whether any analysis of these assets and their settings have played a part in determining whether the site is appropriate for such large scale development given the potential effects on their significance, or whether such analysis has been taken into account in determining the indicative capacity. They further note the absence of explicit reference to the historic environment within policy PL10. They consider there is a risk that the approach set out in section 3 (Places) and the constituent</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>site allocations undermines the strategic approach set out elsewhere in the Plan to the historic environment.</p> <ul style="list-style-type: none"> <li>The Canal and River Trust is supportive of the recognition of the importance of waterways to the historic development of the borough in para 7.4.5, and the need for new development to respond to cultural, built and landscape heritage and to integrate it into the sustainable growth agenda and improve access to it.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>London Historic Parks and Gardens Trust requires clarify that the whole policy applies to designated and non-designated heritage assets. Furthermore, to clarify (part 2d) the objective to remove heritage assets from the Heritage at Risk Register is by safeguarding their future and ensuring they remain designated heritage assets. Moreover, to clarify (part 3) all new development should contribute to the character and appearance of adjacent heritage assets (both designated and non-designated). This is especially important in the context of parks and open spaces.</li> </ul> <p><b>Wider community</b></p> <p>No specific comments.</p>
Policy DE5: Strategic and local views	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The Lee Valley Regional Park Authority is supportive of Policy DE5 Strategic and Local Views. As it identifies the long-distance views out from the Park at Rammey Marsh across to the open countryside beyond the M25 as important. Similarly, a number of other views across the Park (and the Borough) from outside Enfield to the east are also identified. Policy seeks to ensure development positively contributes to the setting and integrity of these views as they make a significant contribution to the character and identity of the Borough. The protection and significance of views out from and across the Park are recognised in PDF Area Proposals particularly in relation to Rammey Marsh.</li> </ul> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Countryside Properties (UK) Ltd consider the policy overly vague and potentially onerous where it states: 'where developments are likely to be visible within designated important views, the council will require the production of accurate visual representations of the development from the surrounding area and from different points within the viewing corridor. Dynamic models, such as VuCity, will often be sufficient.' It is important that this policy is applied in a proportionate and flexible manner.</li> <li>• Friends of Forty Hill Park consider a longer distance important view no. 6 - should also include across the northern part of Forty Hall looking east from Whitewebbs Road/ Lane.</li> <li>• London Historic Parks and Gardens Trust, suggest that this DM policy should also apply to views of and from designed landscapes including parks and open spaces. Developments can potentially impact on designed views into, as well as from the landscape and its setting, adversely affecting their landscape character and defined significance. Para 7.5.3 should be part of the policy.</li> <li>• The Enfield Society raise significant concerns about the proposals, Figure 7.2 omits the very important strategic views of the open countryside on both sides of Enfield Road, which provides a sense of separation between Oakwood and Enfield Town, and which are highly valued by users of the A110 Enfield Road, providing a clear sense of separation between the town and the countryside. It also fails to indicate the fine views south and west from the periphery of Trent Park (see our objection to Policy SP PL10).</li> <li>• Cllr Alessandro Georgiou indicates that the council has recognised that the views from certain sites within the Greenbelt are valued. All sites that would be negatively impacted if this proposal were to proceed.</li> <li>• The Hadley Wood Neighbourhood Planning Forum suggest that Policy DM DE5 requires development to "positively contribute to the setting and integrity of important local views (..) and shorter-distance local views (as identified in conservation area character appraisals". The Hadley Wood Heritage and Character Assessment (Appendix 6) highlights the proposed development site as having "important views"</li> </ul> <p><b>Wider community</b></p>

Chapter or policy reference	Summary of main issues
	No comments received.
Policy DE6: Tall buildings	<p>Mixed views were received with objections particularly from residents living close to proposed allocations as well as objections where tall buildings would have an impact on local character. However, there was general support from developers promoting their sites.</p> <p>Main issues on tall buildings include:</p> <p><b>Specific bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Neighbouring authorities provided general support for tall buildings in principle but wanted the council to take into account the impact tall buildings have on neighbouring boroughs, the Green Belt, heritage assets, conservation areas and their settings.</li> <li>• The GLA preferred the identification of broader areas or ‘tall building zones’, where there would be certainty that within those areas tall buildings would generally be acceptable and outside of those areas they would not. They also indicated that building heights identified in Figure 7.3 of the draft Plan should be carried through to be reflected clearly in the site allocations.</li> <li>• Historic England indicated that the plan is absent on an assessment of local sensitivity to development and the effects of heights proposed on heritage significance. It emphasised that the Plan should be much clearer as to these potential effects and how they will be managed and recommended an assessment of significance to determine appropriate heights.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Developers provided support for tall buildings around stations as an appropriate area but policy should provide a flexible approach to encourage tall buildings in areas that are not identified within tall building areas and give consideration to the changing nature of surrounding context where large developments are being planned to come forward.</li> </ul>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• There was encouragement from developers that the borough should fully unlock the potential that tall buildings have by giving significant weight to the community benefits that come with tall buildings (including the delivery of affordable housing) when assessing development proposals.</li> <li>• References to height should be removed with heights in metres being the preferred approach for measuring tall buildings.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• There were concerns amongst the wider community that the plan lacked massing models and people weren't able to properly scrutinise each of the sites; the text on the plans were too small to read.</li> <li>• A larger number of residents considered that tall buildings around stations is inappropriate – as Enfield is a suburban area and characterised by low-rise buildings, tall buildings are not in keeping with the borough's character, particularly in market-town setting.</li> <li>• In a similar vein, several residents highlighted the potentially harmful impacts of tall buildings on the of Enfield Town specifically, arguing that the historic market town character would be negatively affected.</li> <li>• There were concerns from the wider community and local politicians that tall buildings are less sustainable than those which provide a similar quantum of development in other configurations.</li> <li>• The wider community objected to tall buildings as they would not meet local housing needs and not provide enough family sized homes.</li> <li>• Residents were concerned that tall buildings would be a repeat of Grenfell Tower and the potential dangers associated with tall buildings</li> <li>• A small number of residents were in favour of building tall buildings in town centres as they are a better use of brownfield space, if well designed.</li> </ul>

Chapter or policy reference	Summary of main issues
<p>Policy DE7: Creating liveable, inclusive and quality public realm</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Hertfordshire County Council is supportive of this policy, suggesting that a further consideration for public transport is needed, particularly with regard to creation of safe and accessible routes.</li> <li>• LB Waltham Forest is supportive of the approach taken to secure high-quality and well-designed development in the borough in the plan period in line with the NPPF.</li> <li>• TfL Spatial Planning is supportive of this policy, suggesting that it would be helpful to confirm support in part 3 for adoption of the Healthy Streets Approach to ensure consistency with other sections of the Local Plan.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Feryal Clark MP is supportive of the commitment to deliver a greater provision of electric charging points to encourage the shift away from petrol vehicles. But notes that a 'greater public transport provision to key development locations is the only solution to reduce car dependency locally and development to date has done little to address this'.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• A few residents suggest that the Plan to include important strategic views of the open countryside on both sides of the A110, shorter distance local views well worthy of protection i.e. Priors Hospital looking over Grovelands Park and lake, Christchurch Southgate from the Walker cricket ground and The Arnos Park Pymmes Brook floodplain looking towards the Piccadilly Line viaduct.</li> </ul>
<p>Policy DE8: Design of business premises</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Hertfordshire County Council is supportive this policy in enabling businesses to promote a shift to sustainable travel amongst their staff.</li> </ul> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Henry Boot suggest caveating this policy to make clear that co-location will only be supported on non-designated sites/ LSIS.</li> <li>• British Land indicate that the content is centred on acknowledging the difference in design and materiality between resi and industrial buildings. Amended text/ removals suggested for section 1 parts a, b, h, l, and part 3.</li> <li>• DTZ Investors note that this policy is overly prescriptive and does not allow sufficient flexibility reflecting the variance of typologies across business users. Recommend that the policy is split into two parts, one which shall apply to more placemaking compatible business uses (i.e. offices, retail), and the other to more intensive uses (i.e. industrial).</li> </ul> <p><b>Wider community</b></p> <p>No specific comment.</p>
Policy DE9: Shopfronts and advertisement	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Highways England raise a concern that there is no reference on the SRN or Highways England within this Local Plan policy.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• No specific comment</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• General comment, suggesting minimising backlit signs, keeping signs to traditional cohesive sizes, limiting full shutters and enforcing improvements to shop fronts even where applicants for poor quality changes can show similar examples of what they are applying for as grounds for their application to be accepted. The policy needs to be enforced properly.</li> </ul>

Chapter or policy reference	Summary of main issues
<p>Policy DE10: Conserving and enhancing heritage assets</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>Historic England is supportive of this policy and suggest that it would be helpful if it were to contain support for proposals to resolve cases on the Heritage at Risk register within the borough, and to require appropriate energy efficiency measures relating to heritage assets to avoid any adverse impacts on heritage significance through maladaptation. Moreover, they noted that strategic policies PL1-PL7 underplay the potential effects of the envisaged development on the historic environment, existing local character and significance of individual heritage assets across each area. While it is clear that there are differences in sensitivities to development between the various places, almost all contain designated heritage assets which would be affected to some degree, while the effects of the proposed tall buildings at Meridian Water (PL5) may have impacts both beyond the immediate site boundary and indeed on areas (and heritage assets) in neighbouring boroughs. They recommend that the placemaking vision as well as strategic policies for each place including specific reference to understanding, conserving and enhancing the significance of the historic environment, both to better reflect national planning policy but also to align more closely with strategic policies DE1 and DE4 elsewhere in the Plan. All relevant heritage assets should also be clearly identified on maps and diagrams.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>London Historic Parks and Gardens Trust raised a number of concerns indicating that 8 POLICY DM DE10. This policy is worded as a strategic policy; it does not provide certainty to developers for the preparation of development proposals and does not provide decision takers with the detail to assess an application.</li> <li>London Historic Parks and Gardens Trust indicated that proposals affecting the layout, design, character, use and function of both designated and non-designated historic parks and gardens should retain and enhance their significance and should not prejudice their future restoration. Features such as original planting layout, garden buildings, statuary, railings, steps and fountains should be identified and protected. The impact of development on views from and towards historic open spaces should be carefully managed to maintain the character and enjoyment of these spaces. Consents for temporary development and events in open spaces should ensure subsequent restoration.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li data-bbox="667 288 2018 424">• Social Housing Plus – Fore Street Limited (c/o DP9 Ltd) suggest that Parts 1 and 3 of the draft policy should be combined to better reflect the National Planning Policy Framework (NPPF). This would allow the consideration of impact on a heritage asset and the benefits a scheme would deliver. At the moment this important consideration is dealt with separately within draft policy.</li> <li data-bbox="667 453 2018 719">• Edmonton Hundred Historical Society (EHHS) raise concerns that the plans for a large housing development on the Green Belt, notably the historic Enfield Chase. The EHHS, now in its 85th year, covers the whole of Enfield Borough. At its heart is the Chase, much of it still undeveloped. It has a special place in the hearts of Enfieldians, not only those familiar with its history. An assault on this precious resource once started will increase year by year, with ever more housing, roads, and pollution. Ideally, Green Belt sites should be removed from the Strategic Housing Land Availability Assessment and proper consideration be given to developing Enfield's brownfield sites and conserving the Green Belt for future generations.</li> <li data-bbox="667 754 2018 1225">• Residents of the Hadley Wood Conservation Area indicate that the map shows the Hadley Wood Conservation Area straddles the railway in the centre of the proposed Intensification Zone and extends over 350 metres to the south-west and over 450 metres to the north-east. Any relaxation of the planning regulations regarding taller buildings and more intensive development not only within the Conservation Area but anywhere within the 800 metres radius from Hadley Wood Station would harm the character and ambience of the area and destroy the purpose for which the Conservation Area was established over thirty years ago. Intensification cannot be applied within the Conservation Area and anywhere around it that would damage the integrity of the Conservation Area. In particular the heights of new buildings should be no higher than the rooflines of existing houses and shall be for residential occupation only. The Conservation Area lies in the middle of the proposed Intensification Zone and is protected as a heritage asset with a consistent architectural style and a spacious leafy suburb of high quality, unsuitable as a site for intensification. Trees, some protected by Tree Preservation Orders, in the streets and in front and back gardens that rise above the rooftops are an intrinsic part of the character of the area and must not be destroyed.</li> <li data-bbox="667 1259 2018 1385">• The Enfield Society noted that a heritage impact assessment should have been undertaken to inform the selection of development sites and the form and extent of development. This should involve appreciation of the nature of historic landscapes and their collective contribution to understanding of the historic environment. A Heritage Impact Assessment, including modelling of the impacts from</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>relevant vantage points should have been presented for public comment at the Regulation 18 stage of consultation.</p> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No specific policy comment but large number of residents noted concerns regarding SP policies PL9 and 10 which proposes the redesignation of the Green Belt for housing and other purposes, indicating that these sites are part of the historic Enfield Chase, which is unique and played an important role in Enfield.</li> </ul>
<p>Policy DE11: Landscape design</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The LVRPA welcomes the detail that is set out in this policy, which seeks to ensure landscape character and distinctiveness including its biodiversity, cultural value and tranquillity are restored, conserved and enhanced as part of development proposals.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Cockfosters Local Area Residents Association strongly support the emphasis on conserving and enhancing the Borough's landscape character, particularly Trent Park, but considers that it is difficult to understand. There appears to be a disconnect between the policy and Figure 7.4. They assume the potentially suitable locations referred to in the policy are what are referred to on the plan as: Appropriate location for tall buildings to mark station, Appropriate location for tall buildings frontage, or Appropriate area for tall buildings. Specifically, they are concerned that an area adjoining Cockfosters Station is shown as an 'Appropriate location for tall buildings to mark station', albeit that the boundary with the Green Belt is shown as a 'sensitive edge'. The maximum height is shown as 45 metres (15 storeys). This would appear to directly contradict the following policies elsewhere in the plan: SS1, PL8, DE11, DMD43, DMD44, DMD83, Enfield's Local Plan evidence base: Tall buildings and important local views March 2013.</li> <li>The London Historic Parks and Gardens Trust consider that the policy has been placed in the supporting text rather than the policy statement. This means it will not have the status of the adopted</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>plan and will carry limited weight in the determination of planning applications by the council or by the planning inspectorate.</p> <ul style="list-style-type: none"> <li data-bbox="667 384 2018 552">• The Enfield Society consider that the Council does not appear to have given any consideration to the Areas of Special Character in selecting its preferred development sites. Development on the above sites would cause severe harm to the Enfield Chase Heritage Area of Special Character (AoSC). A review of the AoSC undertaken by the Council in 2013 is attached to our submission at Appendix F. Expert testimony and various documents confirms that Enfield Chase is of national significance.</li> <li data-bbox="667 584 2018 983">• The Hadley Wood Neighbourhood Planning Forum makes reference to the current policy set out in DMD84 which restricts development in Areas of Special Character and requires that features or characteristics which are key to maintaining the quality of the area must be preserved and enhanced. The draft Local Plan is silent on Areas of Special Character, presumably because both the Hadley Wood and Chase Park sites have that designation and their release from the Green Belt – to allow development - would be indefensible. NPPF para 174 states, inter alia, that “planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes [...] recognising the intrinsic character and beauty of the countryside”. NPPF para 101 states that “the designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them”. The Areas of Special Character designation, or an equivalent, must be retained and the protections afforded to the spaces must continue.</li> <li data-bbox="667 1015 2018 1383">• The Hadley Wood Neighbourhood Planning Forum makes reference to Enfield’s policy DMD 84 states that “new development within the Areas of Special Character will only be permitted if features or characteristics which are key to maintaining the quality of the area are preserved and enhanced” and explains that Areas of Special Character “are important for their historic landscape character and rural character”. The draft Local Plan does not have a section equivalent to said DMD84, presumably to allow the release of, and development on, the Green Belt land in Hadley Wood and Chase Park without having to undertake any landscape assessments. However, NPPF para 101 states that the designation of Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them, and NPPF para 174 states, inter alia, that “planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes ... , recognising the intrinsic character</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>and beauty of the countryside". The Areas of Special Character must be therefore reinstated in the new Local Plan.</p> <ul style="list-style-type: none"> <li>• The Hadley Wood Neighbourhood Planning Forum highlights that Policy DM DE11, section 1, omits the Hornbeam Hills South from the list of areas of landscape character. The area was included in the 2013 Area of Special Character Boundary Review, as well as the South Hertfordshire Landscape Character Assessment, and the Policy must be amended to reflect this.</li> <li>• The Hadley Wood Neighbourhood Planning Forum considers that the current safeguards of DMD84 must be retained.</li> <li>• LBE property services support this policy.</li> </ul> <p><b>Wider community</b></p> <p>None noted.</p>
Policy DE12: Civic and public developments	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• NHS London Healthy Urban Development Unit, note that it is unclear how this policy relates to Strategic Policy SP SC2 which addresses the same issues such as creating a strong active frontage (b), optimise the use and capacity of the site (c) and operate as a multifunctional space (d). Whilst they support the aim of the policy to create well-designed accessible buildings, with potential to collocate services and share spaces, not all new health facilities will be of a scale and type which will provide this opportunity, particularly new health facilities not in NHS ownership and leased from private developer or landowner. The range of services accommodated in a new facility will be determined by service strategies.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• None noted.</li> </ul> <p><b>Wider community</b></p>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• None noted.</li> </ul>
Policy DE13: Housing standards and design	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Countryside Properties (UK) Ltd indicate that elements of policy DE13 are considered overly prescriptive. notable elements which have the potential to constrain an innovative design approach include the following specified in the draft policy. Noting that design requirements should be balanced with the policy aim of London Plan policy D3 which requires a design-led approach. Stipulations in draft policy DE13 if applied uniformly across the borough may restrict and constrain a design-led approach in the borough's most accessible and sustainable locations.</li> <li>• London Historic Parks and Gardens Trust suggest following, in addition, housing development which benefits from its proximity to a public open space should contribute to its ongoing maintenance. Development close to or adjacent to a greenspace should contribute to: <ul style="list-style-type: none"> <li>- additional maintenance costs arising from increased footfall</li> <li>- additional facilities to cater for the additional users e.g. playspace, seating, planting</li> <li>- landscape improvements to mitigate adverse impacts on the park arising from the development.</li> </ul> </li> <li>• Social Housing Plus – Fore Street Limited (c/o DP9 Ltd) indicate that although the draft policy states that residential development will only be supported there it preserves the amenity of existing and new occupants in terms of daylight/sunlight/outlook etc. Whilst draft policy explains regard will be had to best practice guidance, the draft policy doesn't recognise the frequent issues which design teams need to consider and balance in developing proposals for sites in built up areas. In addition, parts 2 and 3 are seeking to set very prescriptive design standards. Draft policy should be amended to allow discussions around the form of development to take place as part of the pre-application and</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>application process which allows the individual consideration of sites and their unique constraints and opportunities.</p> <ul style="list-style-type: none"> <li>TfL Commercial Development broadly supports Draft Policy DM DE13, however request that clarity is provided in relation to Section 1 (g) which requires the provision of 'adequate' car parking. TfL CD request that this policy is framed in the context of London Plan Policy T6, Car Parking, which requires that 'car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite') (Section B) and Draft Policy SP T1, which is consistent with this approach.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>General comment, indicating that private and public landlords should be under the same obligation. Standards of housing should be maintained / improved and a lot of jobs would be created during the 1980s there was a scheme that subsidised house improvements and raised the standard of our existing housing stock.</li> </ul>
Policy DE14: External amenity standards	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comment</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>The Enfield Society in principle supports this design policy, including shopfronts and advertisements, civic and public developments, housing standards and external amenity standards.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comment.</li> </ul>

Chapter or policy reference	Summary of main issues
Policy DE15: Residential extensions	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Bush Hill Park Residents Association are supportive of this policy</li> <li>• Lakes Estate Conservation Area, suggest that more explanation is given to other types of residential developments in CAs subject to article 4 directions. They would like the LBE to encourage residents to bring forward high quality proposals which get planning consent, rather than poor quality plans which are refused or which have an adverse impact when built.</li> <li>• The Hadley Wood Neighbourhood Planning Forum indicate that this policy has no maximum angle for single storey extensions and has 45 degrees for extensions above ground floor. This is materially more lenient than the current 30 degrees for above ground floor and 45 degrees for single storey. The substantial height of single storey extensions can materially impact daylight and amenity value, and the max 45 degrees should be retained also for single storey extensions</li> </ul> <p><b>Wider community</b></p> <p>No comment.</p>

**Table A.10:** Summary of main issues – Chapter 8: Homes for all

Chapter or policy reference	Summary of main issues
Policy H1: Housing development sites	The most discussed consideration here was the preferred housing target figure. Site specific comments were also noted, which are summarised in relation to the relevant site allocations later on.

Chapter or policy reference	Summary of main issues
	<p data-bbox="618 284 994 316"><b>Specific bodies (Statutory)</b></p> <ul data-bbox="674 347 2029 1257" style="list-style-type: none"> <li data-bbox="674 347 2029 480">• The GLA indicated that they did not believe the approach to setting the housing target aligned with the London Plan explanatory text in 4.1.11 and should be revised to be based on this guidance. They also highlighted NPPF guidance that indicates that sites do not need to be identified beyond the 0-10 year period.</li> <li data-bbox="674 512 2029 608">• The GLA suggested that the Council may wish to consider applying a stepped trajectory, given the periods in which housing is expected to be delivered, and that this could help navigate the Housing Delivery Test.</li> <li data-bbox="674 639 2029 735">• The GLA stated they were interested to learn how Enfield has engaged with landowners and stakeholders directly, to not only catalyse earlier development on sites, but to also identify new sources of housing supply, including the currently untapped potential from small sites.</li> <li data-bbox="674 767 2029 831">• The GLA set out a range of suggestions that the borough might wish to consider in order to help meet housing targets.</li> <li data-bbox="674 863 2029 927">• Historic England strongly suggested undertaking a significance-based approach to site allocations, as set out in their guidance.</li> <li data-bbox="674 959 2029 1023">• Sport England highlighted that any disposal or building on playing fields or open space should consider the local playing pitch needs as per the playing pitch strategy.</li> <li data-bbox="674 1054 2029 1150">• The Environment Agency (for proposed housing sites) highlighted relevant guidance in relation to potable groundwater abstractions and groundwater protection that would need to be considered in assessing development proposals.</li> <li data-bbox="674 1182 2029 1246">• The NHS London HUDU highlighted a number of sites which could include health uses subject to evidence of need.</li> </ul> <p data-bbox="618 1289 1133 1321"><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Some developers and organisations such as the Home Builders Federation supported the proposed housing target the plan was planning for.</li> <li>• On the contrary, some landowners and developers took the view that the preferred housing figure would not sufficiently meet the development needs of the borough and had promoted higher numbers for their sites (proposed) and several alternative development sites.</li> <li>• Some developers also suggested that the Council should adopt a higher target for the overall housing target the plan is planning for, and many suggested that an additional option should be tested that lay between the 25,000 homes planned for in the draft, and the c. 55,000 homes that the standard method would suggest are required. This assertion was supported by technical detail in relation to arriving at the most appropriate housing target to plan for.</li> <li>• Developers highlighted that the council has a track record for under delivery, as shown by the latest Housing Delivery Test results – which show that over the previous three years the Council has failed to deliver enough homes to meet their housing target (56% of the target) with a declining rate of new homes being completed each year. Therefore, to reverse this decline the plan should be using the target set by the Government’s Standard Method. It needs to take an ambitious and proactive approach to meeting housing needs in the borough.</li> <li>• The Home Builders Federation suggested that in given the fluctuation of housing delivery in the borough it was important the Council had a significant buffer to ensure that housing targets were met on an annual basis.</li> <li>• Many developers continued to promote sites they had previously submitted for inclusion as site allocations where these had not been included.</li> <li>• One developer noted that should the Council adopt a stepped trajectory this should be as flat as possible, to ensure that the planned delivery towards the end of the plan period did not represent a significant uplift compared to previous years.</li> <li>• It was suggested that the Council should support a wider range of developers, showing more positive support for Build to Rent products.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Another issue raised was the need for the borough to identify locations for new third age living developments, noting that the London Plan sets a benchmark in this regard and the local plan does not have a strategy to address this need.</li> <li>• A number of community groups highlighted the number of proposed housing site allocations that included existing food retail and objected to this proposed policy as it suggested that the substantial amount of housing proposed for the sites was likely to lead to a significant reduction in car parking.</li> <li>• It was suggested that if measures were introduced to reduce the level of lapsed planning permissions the proposed number of site allocations would not be required.</li> <li>• Local groups such as Enfield Road Watch also queried the soundness of the housing figures, suggesting that the capacity of brownfield sites should be re-assessed and that population growth forecasts are too uncertain to be relied on owing to factors such as Brexit and the pandemic.</li> <li>• Some local groups also questioned whether periods in which housing delivery was expected from various large sites had resulted in undercounting, as estimates within the local plan documentation contradicted information contained within other Council documents.</li> <li>• One community group suggested that the Council should pursue a more radical interventionist approach with use of CPOs to help meet housing targets.</li> <li>• A number of local community groups suggested that the plan does not include enough small sites to meet the London Plan target and it was also suggested that 'wide areas of search' had not been considered through the SHLAA/HELAA which was an oversight.</li> <li>• Some local community groups also noted that the housing target did not build on the GLA's 2017 SHLAA and suggested the approach of rolling forward the 1,246 dpa target was not appropriate.</li> </ul> <p><b>Wider community</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• There is acceptance that there is a need for housing but many felt that the scale proposed was too much and were critical of the Government's approach to calculating need, favouring the Mayor's targets instead.</li> <li>• Residents considered the figure to be too high and would like to council to explore justifications for meeting this figure, including the possibility of exporting growth elsewhere in London and the UK, seeking assistance from neighbouring authorities and/or not accepting any migration / growth at all.</li> <li>• A small number of residents did support new housing, suggesting that prices are far in excess of what is affordable to most people currently and that brownfield development can only go as far to meeting these needs. It was felt that increasing supply would help prices in the long term.</li> <li>• There was general support for development of housing on brownfield sites, though it was felt that not all options had been adequately explored by the Council and concerns were raised in relation to specific sites.</li> <li>• There were concerns about housing growth in the borough and the lack of associated social (GPs, hospitals and schools) and physical infrastructure (public transport, utilities and water) provision to meet existing needs, let alone the needs of the future population.</li> <li>• Some residents wanted new housing to be targeted to local people in need and not to London commuters and those living outside of the borough.</li> <li>• Some residents were concerned about the impact of increased densities on people's physical and mental health and associated environmental factors such as air pollution.</li> <li>• Some residents felt that the Council should focus on delivery of affordable housing (social rented housing) specifically.</li> <li>• Some residents noted the populations projections informing the housing target had not adequately factored in the impacts of Covid-19 and Brexit.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Some residents also commented that the impacts of Covid and Brexit on existing non-residential premises such as shops and offices was not fully known yet, and many of these might be able to come forward for housing.</li> <li>• There was significant concern around the number of supermarket sites proposed as allocations for housing, and whether these uses would be re-provided, and whether there would be adequate car parking provided alongside any replacement facilities.</li> </ul>
Policy H2: Affordable housing	<p><b>Statutory bodies</b></p> <ul style="list-style-type: none"> <li>• The GLA welcomes the strategic target set out in policy H2 but considers Part 3 of Policy H2 should make it clear that the Mayor’s affordable housing thresholds are not targets but are the level of proposed affordable housing beyond which viability assessments are no longer required as part of planning applications; the Fast Track Route (FTR). Where planning proposals do not meet or exceed the affordable housing thresholds, they will be required to take the Viability Tested Route (VTR) and will need to provide viability assessments as part of planning applications and will be subjected to viability reviews in accordance with Policy H5 of the LP2021. As currently drafted the thresholds appear to be targets and should be amended accordingly to ensure it is consistent with the London Plan.</li> <li>• The GLA highlight that part 3a of the Policy which seeks 50% affordable housing from estate regeneration is not consistent with Policy H8 of the London Plan. Policy H8 and paragraph 4.8.5 of the London Plan make it clear that where estate regeneration involves the loss and replacement of affordable housing, it should deliver an uplift in affordable housing wherever possible. These types of estate regeneration schemes must go through the VTR to demonstrate that they have maximised the delivery of any additional affordable housing. Enfield should follow the guidance set out in Policy H8 of the London Plan and associated supporting text.</li> <li>• The GLA highlight that part 7 of Policy H2 of the draft Plan is not consistent with Policy H5 of the London Plan as it sets out that regard will be given to the economics and financial viability of the development when determining the requirement for affordable housing. Where residential proposals meet or exceed the thresholds in Policy H5 of the London Plan they will not be required to provide</li> </ul>



Chapter or policy reference	Summary of main issues
	<p>viability evidence and will be subject to the FTR. Only those proposals that cannot meet the threshold levels will be required to take the VTR to submit viability information and will be subjected to review mechanisms in accordance with Policy H5 of the London Plan. Part 7 should be removed or amended accordingly to make it consistent with the London Plan.</p> <ul style="list-style-type: none"> <li>• The GLA considers that the propose a tenure mix of 50% social and affordable rented housing and 50% intermediate housing is consistent with the approach set out in Policy H6 of the London Plan. However, Enfield should ensure that the proposed 50/50 split is based on local evidence. The London Plan at paragraph 4.6.2 makes it clear that there should be a presumption that the 40% to be determined by the borough will focus on Social Rent and London Affordable Rent, given the level of need for this tenure across London. Of particular relevance, is Enfield’s Strategic Housing Market Assessment (2015) (Enfield’s most recent assessment) which recommends that the borough’s tenure split should be set at 70% for social and affordable rent and 30% intermediate housing. Part 4 of Policy H2 suggests that there may be flexibility in applying the required tenure split to applications subject to viability. It should be noted that where proposals diverge from the required tenure split, they will be required to take the VTR in accordance with Part B of Policy H6 of the London Plan. In these cases, proposals will be subject to viability review mechanisms.</li> <li>• The GLA noted and reflected in the draft Plan that where off-site or cash-in-lieu payments are considered as an acceptable alternative to on-site affordable housing, such schemes will be required to follow the VTR and will also be subjected to early and late stage review mechanisms in accordance with paragraph 4.5.15 of the London Plan. It should also be noted that in these circumstances the affordable housing level is set at 50% provided across the main site and any linked sites when considered as a whole in line with paragraph 4.4.13 of the London Plan.</li> <li>• The London boroughs of Waltham Forest and Redbridge are supportive of Enfield’s strategy for delivering housing across its Local Plan period on the sites allocated in the Local Plan.</li> <li>• LB Waltham Forest look forward to working collaboratively on schemes that come forward on sites on and surrounding the boundary between the two boroughs. They are delighted that the Council has decided to maximise the delivery of affordable housing in the plan period, aiming to secure 50% of all new homes delivered as being genuinely affordable.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• LB Redbridge is supportive of Enfield’s approach and recognise that their acute housing needs and reliance on temporary accommodation is comparable in scale to that of Enfield; and they have also seen significant increases in rents, house prices, and housing unaffordability.</li> <li>• LB Redbridge is supportive of the approach to provide 50% affordable housing on Green Belt but it considers the wording of the policy should be clarified to ensure that it includes land that was released from the Green Belt, due to how the Green Belt boundaries change immediately upon adoption, thus it could be interpreted that the de-designated land is exempt from this intended policy requirement.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• NHS London HUDU welcomes the policy and recognises that the shortage of affordable housing is hindering the recruitment and retention of public service workers. It suggests that that the supporting text specifically to innovative approaches that set aside a proportion of homes on land owned by Government departments and agencies for key workers, such as health and education professionals. A nomination approach can be agreed to meet an identified housing need for homes for NHS staff.</li> <li>• Developers Countryside Properties, Warmdam, London Diocesan Fund, Diocese of London, Regenta Development and CLL support the aspiration to maximise affordable housing</li> <li>• CLL suggest that Policy H2 (1) should be revised so that it is clear that the London Plan Threshold Approach (LP Policy H5) should be applied to individual applications and also confirm that ‘genuinely affordable’ is defined in the London Housing Strategy (2017).</li> <li>• CLL supports the requirement for all sites comprising 10 or more new homes or over 10,000sqm to provide on-site affordable housing with a target of 35% for all major housing developments on land which is not council owned, industrial or within the Green Belt. It should be ensured that Policy H2 (3) is clear that the requirements of this policy are subject to terms any portfolio agreement with the Mayor of London. The requirements of Policy H2 (3) should be measured based on habitable rooms.</li> <li>• Countryside Properties consider that the aspiration must be balanced with site specific circumstances. For estate regeneration schemes in particular, affordable housing is one of several community benefits being provided, which can include public realm improvements, provision of youth</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>facilities and enhancements to public transport connections. Often these elements of estate regeneration are as important as the provision of affordable housing, in the role of placemaking. Therefore, Countryside considers that the affordable housing target, as well as being subject to viability, should also take into account site specific circumstances. Accordingly, there is not a need to increase the affordable housing target, as this could deter investment in other community benefits. In addition, Paragraph 64 of the NPPF states that ‘to support the re-use of brownfield land, where vacant buildings are being reused or redevelopment, any affordable housing contribution due should be reduced by a proportionate amount.’ The affordable housing target therefore should be flexible, subject to viability, and support the reuse of brownfield land in line with the NPPF.</p> <ul style="list-style-type: none"> <li>• Developers Warmerdam and Co consider that the stipulation which includes Crews Hill and Chase Park within the Green Belt affordable housing requirement (at the end of part ‘3 c’) should be removed. This will enable new sites which are earmarked for residential development to have a greater chance of delivering a viable scheme whilst contributing 35% affordable housing (part ‘3 d’), subject to viability tests.</li> <li>• Areli for Blackrock suggests changes to the wording of the policy and supporting text to provide flexibility.</li> <li>• Home Builder Federation (HBF), Crosstree Real Estate Partners, Notting Hill Genesis, LBE Conservative Group, Diocese of London (DoL) and the London Diocesan Fund (LDF) wants to ensure that the delivery of First Homes and Exception Sites are an integral part of this policy.</li> <li>• HBF considers that the Council will need to ensure the potential impacts on viability of First Homes is taken into account. As part of this testing, it is important to recognise that First Homes are a market product and as such the risk is with the developer, unlike for affordable housing where the developer is effectively a contractor delivering units for the RSL. This means that the risk associated with their delivery is different to an affordable unit and as such profit associated for the delivery of such homes must be the same as for market housing.</li> <li>• DoL and LDF considers that the approach to First Homes would require a 60% discount to make them affordable for Enfield residents. However, further analysis is required if this policy were to be taken forward in the Local Plan, not least on viability. Currently, the evidence base needs a more</li> </ul>

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	<p>sophisticated analysis than that provided to withstand developer scrutiny. If LBE are seeking to omit First Homes from the Draft Local Plan, this would require robust evidence in order to support this.</p> <ul style="list-style-type: none"> <li>• On Exception Sites, LDF and DoL considers these are a useful tool in delivering affordable homes on land which would otherwise not be suited to come forward for development. Exclusion of this from the Local Plan fails to adhere to the Government’s commitment to allow Exception Sites in the Green Belt.</li> <li>• HBF raises concerns that the viability study indicates that many development typologies in the lower values areas and higher density development in medium value areas will not be viable if required to deliver a 35% affordable housing contribution. Whilst HBF acknowledge that the Council states that where an applicant can demonstrate their development is made unviable by policy H2 it will consider reducing this requirement it is also necessary to consider that the NPPF and PPG are both clear in the Government’s objective of reducing the amount of negotiation at the planning application stage. In order to achieve this objective, it is important that local policies reflect the viability evidence and provide more variation by both area and development typology. Such variation in policy will help to ensure development comes forward in these areas without recourse to negotiation on every application. HBF would suggest that the Council reconsiders this policy and set out a reduce affordable housing requirements in its lower value areas.</li> <li>• Churchill Retirement Living and McCarthy Stone are concerned that the Viability Assessment has overplayed the viability of older persons’ housing. In light of the urgent need to significantly increase the delivery of specialist older persons’ housing in the Borough and across Greater London, they consider that it is imperative that the viability of these forms of development is careful robustly against planning obligations and policy requirements. They are strongly of the view that it would be more appropriate to set a lower, potentially nil, affordable housing target for Retirement Living housing and extra care accommodation in the Borough. The evidence they have provided in their viability appraisals for Retirement Living housing and Extra Care Housing typologies, concludes that these forms of development should be exempt from affordable housing provision. At this stage, the developer consider the Plan is therefore considered to be unsound on the grounds the affordable housing targets are not justified, positively prepared or effective.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Comer Homes is pleased to see that Part 7 of draft Policy SP H2 acknowledges the role of viability in determining the appropriate affordable housing. They remain doubtful that there will be any circumstances where there will be robust viability evidence that will support increasing the target for affordable housing above 50%. 50% is already a challenging target and in the current uncertain economic market, exacerbated by the pandemic, it is likely that there will be schemes that struggle to achieve this and will therefore have to rely on viability evidence to justify a reduced level.</li> <li>• Comer Homes is concerned that where a reduced affordable housing contribution is justified on viability grounds, the applicant will be required to implement the scheme within 12 months of the granting of consent. This is onerous and is not justified – there are no national or strategic policies which advocate this approach. It therefore conflicts with the tests of soundness set out in the NPPF.</li> <li>• Comer Homes is pleased that there is no reference to these contributions in the draft Local Plan (other than 50% affordable housing), however, they are concerned that reference to this in the Topic Paper will raise unrealistic expectations and could be used by the Council in negotiations with applicants.</li> <li>• LBE Property Services support policies H2 and H3 to provide affordable housing, mix and type – and would aim to achieve 35% affordable housing on site and 50% on Green Belt sites.</li> <li>• Bush Hill Park Residents Association considers the policy laudable and unrealistic considering the current position of 40% is missed. In a similar vein LBE Conservative Group also highlight that these targets have not been met for large schemes such as Arnos Grove and Cockfosters Tube Station.</li> <li>• Bush Hill Park Residents Association recommend a more realistic figure is set and enforced through the planning system.</li> <li>• CPRE London and Enfield Road Watch highlights that Green Belt sites cannot deliver affordable housing. Evidence shows that housing developments in Green Belt have historically delivered only 10% affordable homes and these are not even genuinely affordable.</li> <li>• Enfield Road Watch do not believe that the proposed plan will deliver the housing that most local people need. What Enfield needs are affordable homes in areas with existing public services and</li> </ul>

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	<p>good transport links, not unaffordable and sprawling executive homes in rural locations that use land inefficiently and increase car-dependency. The Council should refocus its objectives on building high quality mid-rise homes, in a range of unit sizes including family homes, in non-Green Belt locations across the borough. In particular, the Council should prioritise high quality development in under-utilised brownfield sites, that includes new high quality private and public open space.</p> <ul style="list-style-type: none"> <li>• LBE Conservative Group welcomed the approach taken to encourage affordable housing. However, greater recognition is needed of the potential role of housing associations working in partnership with the Council.</li> <li>• LBE Conservative Group agree with Para. 8.2.15 that affordable housing contributions from developers should be calculated on the number of habitable rooms per unit and gross floor space and that contributions will continue to be assessed based on the financial viability of the schemes in question up to a maximum of 50%.</li> <li>• The Enfield Climate Action Forum Land Use Working Group highlights that there is no clarity about what “affordable” and ‘genuinely affordable’ means. The commitments to affordability are vague.</li> <li>• The Southgate District Civic Voice query the assumptions, based on the viability paper, that greenfield sites such as Chase Park will yield 50% affordable housing. It recognises Enfield’s track record in achieving affordable housing does not back this up. Developers will inevitably find a way to reduce the levels of affordable housing to well below this level, for example by finding abnormal costs. London Councils has recently argued convincingly that market failure should be acknowledged, and direct public sector provision of affordable housing accelerated.</li> <li>• Local MPs highlight that the policy is positive and ambitious, but questions whether local people will be able to afford the homes that may be built if development on the green belt is permitted and whether they will deliver the mix of homes Enfield needs.</li> <li>• Local Councillors consider that the Local Plan is devoid of a decent strategy for meeting the very real housing shortage in Enfield and could compound the housing issues in the Borough. The needs of the most vulnerable have been ignored in favour of superficial targets.</li> </ul>

Chapter or policy reference	Summary of main issues
	<p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Provision of affordable homes is supported on brownfield sites.</li> <li>• Provision of affordable homes is supported but not at the expense of the Green Belt.</li> <li>• The commitment to secure 50% of all new homes as genuinely affordable is supported.</li> <li>• Respondents were not clear on whether new homes in the north of the borough will be affordable and prefers to have affordable housing focused in the east of the borough where there is more scope.</li> <li>• Respondents were not clear how many homes will be designated as council homes.</li> <li>• Respondents were not clear on what is actually meant by affordable, and how the council can ensure that a developer will build 'affordable homes'.</li> <li>• Residents raised concerns that the homes proposed at Crews Hill and Chase Park will be luxury development doing little to help the 3,500 families in temporary accommodation and unaffordable.</li> <li>• Residents highlighted the market value for new houses on the Green Belt is out of reach for the majority of working families. Respondents indicated that developers charge a premium and the development by Berkeley Homes on the former Middlesex University site within Trent Park is a prime example of this.</li> <li>• Residents are surprised that no reference is made in para 8.2.5 of Section H2 to the new affordable discounted housing for sale product known as First Homes being introduced by government. This product will be delivered through s.106 contributions and may replace other forms of affordable housing, such as shared ownership. Although, this product is still only being piloted through the Affordable Homes Programme, some specific reference to the Council's response to this new initiative from a policy and planning perspective is in our view required in the Draft Local Plan document.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Residents are concerned that development at Meridian Water will be unaffordable and out of reach for the average Edmonton resident.</li> <li>• Residents highlight that affordability isn't driven by lack of supply but primarily by supply driven by buy-to-let houses and the mortgage rules in place. The maximum you can borrow is 5-times of your average income. If the government change these rules, then it would be more affordable.</li> <li>• The need for affordable family homes with gardens is recognised, not more flats or luxury homes.</li> <li>• Residents object to the policy as it allows too much of the affordable housing that may be delivered to be shared ownership, which is generally unaffordable to current residents in Enfield and does not reflect local housing needs of existing residents. Controls are needed to ensure a mix of intermediate housing products are delivered and to control the proportion of shared ownership homes delivered.</li> <li>• Some residents fully support the council's ambition to build more affordable homes and would encourage developments not to price out local need. Fully support the commitment to securing 50% of all new homes as genuinely affordable.</li> <li>• More decent, affordable homes in Enfield – is supported.</li> </ul>
Policy H3: Housing mix and type	<p><b>Statutory bodies</b></p> <ul style="list-style-type: none"> <li>• None noted.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Developer Warmerdam and Co and Wolden Garden Centre concur with part 1a that the dwelling mix should reflecting the most up to date evidence as set out in the Local Housing Needs Assessment (2020) or successor documents.</li> <li>• Bush Hill Park Residents Association and Cockfosters Residents Association supports the inclusion of housing mix and type in policy</li> </ul>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• LBE Conservative Group note there is a widespread problem in the borough of developers providing too many one bed and two bed homes. They suggest that a similar approach be taken in the Local Plan to achieve the desired dwelling size priorities in table 8.1. in section DM H3 so that under the Local Plan developers are required to meet prescribed targets for different unit sizes for specific tenures to overcome the persistent under provision of larger units by developers.</li> <li>• EnCaf feel that the implication that the Local Plan will increase the delivery of larger/family homes with gardens and of affordable housing in the Green Belt is cruelly misleading to low income families and those in temporary accommodation.</li> <li>• CLL supports the Council's target to provide a mix of housing sizes on a borough wide basis having regard to a range of site-specific considerations. There is a clear need for all sizes of housing in Enfield. It is not however appropriate for every individual site to seek to provide the same mix. In accordance with Policy H10 of the London Plan (2021) consideration needs to be given to a range of site-specific considerations (listed in criteria 1-9 of the policy). This is in view of the fact that it is not appropriate or effective for every type of development scheme to target delivery of the same mix of unit sizes. The draft ELP reflects this at paragraph 8.1.11 which states 'The Council expects a high proportion of developments in urban areas to be in the form of flatted developments and therefore rely on lower density greenfield developments to deliver more family housing'. For example, the need for Build to Rent is primarily from households who require for 1- and 2- bedroom homes. This is specifically recognised in the Mayor's Affordable Housing &amp; Viability SPG (2017). Build to Rent schemes are also commonly proposed in highly sustainable locations which are better suited to smaller households. It would not therefore be appropriate to require build to rent schemes to target the delivery of high proportions of larger family sized homes.</li> <li>• SDCV supports the need for suitable housing to meet the housing needs of different groups, including for families, older people, and for affordable housing. There are many examples of high-quality developments across London where such housing has been achieved on brownfield land through efficient layouts and a good mix of planned private and public space.</li> <li>• HBF is unclear why table 8.4 has been included in the policy and what its purpose is and no indication as to how this should be considered by and applicant or whether or not these priorities are requirements. If so, it should make this clear in the policy. Local plan policies need to be clear and</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>unambiguous (NPPF, paragraph 16 d)) and the inclusion of table 8.4 will causes confusion to decision makers and applicants alike and as such should be deleted.</p> <ul style="list-style-type: none"> <li>• HBF suggest that the policy is amended to reflect the findings in the London Plan SHMA which identifies that the greatest need in the type of homes between 2018-2041 is for one-bedroom homes – 55% of the overall supply (market and affordable).</li> <li>• TfL Commercial Development want to collaborate with the Council to ensure its sites deliver an appropriate typology, mix, and size of residential dwelling in accordance with local requirements. It recommends that Section 1 of Draft Policy DM H3 also has regard for housing type when determining an appropriate mix. Within Build to Rent developments, for example, demand for 1- and 2-bed units is often higher than other housing types.</li> <li>• TfL Commercial Development considers that the inclusion of a prescriptive mix for market homes should be removed on the basis that this need will differ depending on the type of housing proposed (sale, rental or retirement etc) and should instead respond to market requirements. It is not appropriate or effective for every type of development scheme to target delivery of the same mix of unit sizes, and therefore they recommend a flexible approach that considers market factors.</li> <li>• Crosstree Real Estate Partners note that priorities may not always be achievable across all sites due to their context and site constraints. In some instances, it may also be desirable to deviate from the above prescribed dwelling mix in order to facilitate the delivery of other benefits associated with a proposal that may not otherwise be deliverable due to viability (for example), should the above prescribed mix be rigidly applied i.e. through the planning balance exercise.</li> <li>• Regenta Developments, Notting Hill Genesis and Origin Housing – have no specific comments to make on this policy but suggests it recognise a transition in traditional family housing and that two-bedroom properties which cater for four people should also considered to be family housing. Greater flexibility to the policy should be considered as there may be material considerations which limit a site’s ability to provide the specified housing unit mix as set out in the policy. An example of this material consideration would be the site’s context and location and how this would have an effect on the unit mix sought of any development. This is particularly relevant to central locations that may be more appropriate for a higher proportion of 1 and 2 bed units. Recommended changes: Strategic</li> </ul>

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	<p>Policy SP H3 to include wording that allows greater flexibility for developers in the provision of housing mix and type dependent on the context of the site.</p> <ul style="list-style-type: none"> <li>• Notting Hill Genesis considers that greater flexibility to the policy should be considered as there may be material considerations which limit a site's ability to provide the specified housing unit mix as set out in the policy. An example of this material consideration would be the site's context and location and how this would have an effect on the unit mix sought of any development. This is particularly relevant to central locations that may be more appropriate for a higher proportion of 1 and 2 bed units. Recommended changes: Strategic Policy SP H3 to include wording that allows greater flexibility for developers in the provision of housing mix and type dependent on the context of the site.</li> <li>• The Enfield Caribbean Association highlights that private developers must not be allowed to just build one and two bedrooms for sale rent.</li> <li>• Local Councillor considers that the plan fails to prioritize the most desperately needed housing requirements of Enfield, being the lack of family homes, particularly three- and four-bedroom homes, which are generally affordable to families on below average to average incomes, (average being average for the borough of Enfield). Instead, there is a tick box concentration on the number of homes as opposed to the type which should actually be provided to alleviate need, given the number of residents who have already been waiting many-many years for adequate housing.</li> <li>• Local Councillor considers that the proposed high-rise buildings in Enfield Town and other areas will not provide the family-sized homes needed either and the lack of clear strategy around Meridian Water means that the opportunity for large-scale building of affordable family homes on brown and grey field sites has been missed altogether. The Local Plan is therefore devoid of a decent strategy for meeting the very real housing shortage in Enfield and could compound the housing issues in our Borough. The needs of the most vulnerable have been ignored in favour of superficial targets.</li> <li>• Better Homes Enfield highlighted that Enfield has an urgent need for affordable dwellings with 3+ bedrooms and a significant need for market housing with 3+ bedrooms, so this policy needs to be rewritten to focus on ways to reflect this need to help ensure that it met. As it stands, the policy</li> </ul>

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	<p>wording appears largely to be a list of loopholes applicants can use to not deliver the mix of housing Enfield needs.</p> <ul style="list-style-type: none"> <li>• LBE property services support Policy H3 but recommends that the Council confirms whether this is a policy requirement or an ambition for the Borough. If a policy requirement, it would be useful for the Council to clarify what housing mix and types are anticipated to be provided within the placemaking areas, particularly Crews Hill.</li> <li>• LBE property services support this policy approach towards housing mix and types. Many of the brownfield sites identified within Policy H1 may struggle to provide larger units, with larger units (i.e. 3 bedroom properties) often more appropriate for greenfield sites since they are able to provide gardens, car parking and open space. As such, they consider that the Council will struggle to meet this requirement on brownfield sites alone and consider that the identification of Crews Hill placemaking area can ensure a large number of family units can be provided.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Residents were concerned that no consideration has been given to older people who live in properties in the Green Belt and who now find themselves difficult to manage. Instead of downsizing to a different area, more consideration should be given to allowing changes to buildings and/or the use of gardens to provide annex accommodation.</li> <li>• Some residents support the consideration of housing for older people, but couldn't see if there was a certain proportion of the proposed housing development that was for sheltered accommodation / care homes etc. Providing alternative housing accommodation for older people not only supports them in terms of their community needs, but also frees up family homes.</li> <li>• Residents welcomed the provisions set out in policy H3, but without an Article 4 Direction the council is unlikely to be able to enforce the provision set out in point 2: Self-contained units will be required to meet (or where possible) exceed the internal space standards of the London Plan.</li> <li>• Residents object Policy H3. They suggest that Enfield needs more homes 3+ bedrooms and indicate that this policy does not put applicants/developers under any pressure to deliver these. They suggest that policies are needed that require applicants to show that they have properly assessed the delivery</li> </ul>

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	<p>of 3+ bedroom homes and explored appropriate designs that would deliver these. DM H3 as it stands will simply see a continuance of the current issues being experienced e.g. applicants come forward with a tower block design and planners say tower blocks are not suitable for families so very few 3+ bed homes are delivered. They suggest that there is a need for policy that puts local housing needs (e.g. family housing) at the very start of the design process, not as the end. Policies are required that encourage or mandate a 'needs first' approach to design and application process.</p>
<p>Policy H4: Small sites and small housing development</p>	<p><b>Statutory bodies</b></p> <ul style="list-style-type: none"> <li>• None noted.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• LBE Conservative Group welcome the emphasis in H4 of the contribution that small sites (under 0.25 hectares) can make to increasing the number of much needed homes in the borough (7,000 units over 20 years). They consider that by building a more realistic number of homes on small sites, the council and RPI led development over the next 20 years would significantly reduce the need to develop on larger sites, including the Green Belt, envisaged in the Draft Local Plan.</li> <li>• Encaf highlights that the Plan does not, in reality, properly account for the London Plan target for small site housing and consider the numbers just don't add up. The draft Local Plan only accounts for (at most) 5,087 homes coming from small sites over the next 20-years, although they think the number is actually closer to 4,100 once various errors in the council's figures have been accounted for. This means that the draft Local Plan is around 3,000 homes short of the minimum London Plan target for small sites. The analysis to uncover these anomalies is quite complex, so we have provided a more detailed explanation in the appendix.</li> <li>• Encaf considers that the council has significantly undercounted the number of homes that will be built on small sites, and this has serious implications. Enfield Council's draft Local Plan sets a proposed strategy for the borough for the next 20-years. An important part of the Plan is identifying where and how 25,000 homes will be built in Enfield over the 20-year period. The council says there are not enough brownfield sites to build 25,000 homes, and that 6,500 homes need to be built in Green Belt areas. However, if the homes built on small sites had been properly accounted for, then at least one</li> </ul>

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	<p>of the Green Belt areas earmarked for development in the draft Local Plan would almost certainly not need to be developed.</p> <ul style="list-style-type: none"> <li>• Cockfosters Residents Association support this policy.</li> <li>• HBF assumes 353 homes on sites of less than 0.25 ha to be an error as table 4.2 of the London Plan sets a target for Enfield to deliver 3,530 homes on small sites. This will clearly need to be amended. The London Plan requires London boroughs, among other things, to identify and allocate appropriate small sites for residential development. In addition, paragraph 69 of the NPPF requires the Council to identify at least 10% of its housing requirement (around 2,500 homes) should be on land of 1 hectare or less that has either been identified as an allocation in the local plan or in the Brownfield Register. It is not clear from the consultation document is the number of small sites that will be specifically allocated in the local plan or identified in the brownfield register. The reason for these policies is to help support and consolidated the work of SME housebuilders who have declined significantly since the advent of the plan- led system in 1990, owing chiefly, to the reluctance of local authorities to identify and allocate small sites. The paucity of allocations for smaller sites means that smaller developers fail to benefit from the statutory principle for applications to be determined in accordance with the development plan.</li> <li>• TfL Commercial Development fully endorse the policy and is in conformity with their ‘Small Sites Programme’.</li> <li>• The GLA highlight that the small sites target in Table 4.2 of the London Plan is a minimum. Opportunities to exceed the target should be explored as an additional source of housing supply. Boroughs like Enfield, require a housing target beyond 2029, the small sites target should be rolled forward and included as a part of it. It doesn’t appear that Enfield have considered this approach, nor has it been factored-in fully in terms of housing delivery. GLA recognise that Enfield propose to do more in order to facilitate small site housing delivery, more could be done now, as part of the Local Plan. As set out clearly in paragraph 4.1.8 of the London Plan, boroughs should identify as many sites, including small sites, as possible via their Development Plan Documents. Only four small sites have been identified as proposed site allocations and would only contribute 195 new homes over the Plan period.</li> </ul>

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	<ul style="list-style-type: none"> <li>• The GLA suggest that Enfield could be more proactive by identifying more small sites as part of their site allocations and by following the approach set out in the draft Good Quality Homes for All Londoners Guidance to facilitate, identify and optimise development potential from the borough’s reservoir of small sites.</li> <li>• Taking the first five years of projected housing delivery from the proposed site allocations, the GLA consider that Enfield could deliver 2,1217 new homes and if the windfall assumption based on the borough’s small sites target is added this would result in the supply of 3,886 new homes. For the following five years (i.e. years 6-10) the site allocations could deliver 11,088 new homes<sup>8</sup>. In the first five years of the Plan, Enfield would not be able to meet their housing target, but from year 6-10 the housing target would be exceeded. Over the 10-year period, on average, Enfield has capacity to deliver 1,497 new homes a year. This level of supply exceeds the borough’s housing target (1,246 homes a year) by approximately 20% (taken as an average over 10 years). Any shortfall in housing delivery in earlier years (i.e. from 2021) should be relatively small and could be met by bringing forward development earlier on from later Plan period sites (from beyond year 10) and/or by identifying further small and other sites.</li> <li>• London City Mission agree that small sites should be located in well-connected locations, with good access to services and facilities. However, they contend that sites outside of this PTAL range should not be discounted, especially if a suitable opportunity is presented to bring a sustainable brownfield site forward.</li> <li>• The Enfield Society supports the principle of this policy.</li> <li>• Better Homes Enfield consider that the potential and role of Small Sites for housing have not been properly considered and conflicts with the London Plan 2021 and with policies from within the Draft Local Plan (DLP) itself e.g. DM H4.</li> <li>• D&amp;JLP supports Enfield Council’s proposed policy to encourage residential development to come forward on small sites. Given the planning constraints on development in an Outer London borough like Enfield which is already built up apart from protected green space, the Council needs to be pragmatic in finding land for new development wherever it can. 144 Firs Lane is a site which would</li> </ul>

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	<p>meet the criteria of this policy particularly as it is located close by to an existing mature residential area with access to a good range of local services and amenities.</p> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Residents welcomed the emphasis in H4 of the contribution that small sites (under 0.25 hectares) can make to increasing the number of much needed homes in the borough (7,000 units over 20 years) but suggest there is variance with the figures in Table 8.2 for unidentified small windfall and other miscellaneous sites.</li> <li>• Some residents objected small sites policy and indicated that the wording 'appropriate' needs to be defined.</li> <li>• Residents largely agree with the aims of this policy but highlights that the Draft Local Plan does not actually properly account for small sites and small housing development (for more information see <a href="https://betterhomes-enfield.org/2021/08/26/homes-built-on-smallsites-serious-discrepancies-between-the-london-plan-and-enfieldcouncils-draft-local-plan/">https://betterhomes-enfield.org/2021/08/26/homes-built-on-smallsites-serious-discrepancies-between-the-london-plan-and-enfieldcouncils-draft-local-plan/</a>). As a result, they suggest that this policy is just words without meaning.</li> </ul>
Policy H5: Supported and specialist housing	<p><b>Statutory bodies</b></p> <ul style="list-style-type: none"> <li>• None noted.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Encaf welcomes the intention of the Council to support the provision of appropriate housing to meet the specialist and supported needs of vulnerable people in Enfield, including specialist housing for elderly people.</li> <li>• HBF recognises that the London Plan sets out in table 4.3 the benchmarks for the delivery of specialist older persons accommodation. This establishes the need for Enfield to deliver 195 such homes per annum over the plan period. This needs to be set out in policy H5 with a clear commitment</li> </ul>



Chapter or policy reference	Summary of main issues
	<p>to meet this level of need and, as set out in policy H13 of the London Plan, to work positively and collaboratively with providers to identify sites to ensure this minimum level of provision is met.</p> <ul style="list-style-type: none"> <li>• Churchill Retirement Living and McCarthy Stone commend the manner in which the housing needs of older people have been comprehensively addressed in the Policy DM H5, but consider that the requirement for specialist older persons' housing in the HNA to be underwhelming and consider the figures stated in the London Plan to be more proportionate to Borough's ageing demographic profile.</li> <li>• Churchill Retirement Living and McCarthy Stone note that sub-clause 8 stipulates that 'to ensure inclusive and mixed neighbourhoods and communities, proposals must not result in a harmful overconcentration of care home accommodation within the locality'. What comprises an 'overconcentration' of care home concentration, and what 'harm' is the Council alleging will arise from 'too may' elderly persons? They consider this element of the policy to ambiguously worded, and potentially open to prejudicial judgement. It is contrary to Paragraph 16. of the NPPF which advises that '(d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.' Seeking to limit specialist older persons' housing in certain locations is also counterintuitive. Both the respondents locate their developments within 400metres (0.25 miles) of a town or local centre to facilitate the continued independence of older people and so well-located specialist older persons' housing development will tend to be concentrated such locations. Indeed, ease of access to community facilities, shops and services is a requirement of sub-clause 2 g) of the Policy. They are of the view that sub-clause 8 should be deleted.</li> <li>• The Enfield Society supports this policy in principle.</li> </ul> <p><b>Wider community</b></p> <p>There was support for the consideration of housing for older people, but couldn't see if there was a certain proportion of the proposed housing development that was for sheltered accommodation / care homes etc. Providing alternative housing accommodation for older people not only supports them in terms of their community needs, but also frees up family homes.</p>

Chapter or policy reference	Summary of main issues
Policy H6: Community led housing	<p><b>Statutory bodies</b></p> <ul style="list-style-type: none"> <li>• LB Redbridge highlighted that there is an additional benefit in the ability of the proposed allocations to provide serviced plots for self-build housing. They indicate that most London boroughs struggle to discharge their requirements regarding the Self-build and Custom Housebuilding Act 2015. However, strategic sites offer the opportunity to provide serviced plots alongside a mainstream development. Such new self-build housing could benefit from a “plot passport” approach and would not be constrained by the character of an existing area and significant architectural freedom afforded.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The Enfield Caribbean Society suggests that the council should embrace the private rented sector, including developing houses to let. Wider suggestions include establishing a BME Housing Association forum</li> <li>• The Enfield Society supports this policy in principle</li> <li>• Better Homes Enfield consider that the policy is uninspiringly drafted which gives the impression the council is not really that supportive of this form of housing. They believe the lack of attention to detail about providing the information needed to assess this policy properly is illustrative of the council’s lack of support for community led housing. The LHNA considered demand for this type of provision and said that the council should encourage provision of self and custom build plots through policy and major allocations identified in the Local Plan but does not appear to have happened.</li> </ul> <p><b>Wider community</b></p> <p>None noted.</p>
Policy H7: Build to rent	<p><b>Statutory bodies</b></p> <ul style="list-style-type: none"> <li>• None noted.</li> </ul>

Chapter or policy reference	Summary of main issues
	<p data-bbox="618 288 1133 316"><b>General bodies / other organisations</b></p> <ul data-bbox="667 347 2033 1377" style="list-style-type: none"> <li data-bbox="667 347 2033 515">• CCL recognises Build to Rent has the benefit of being capable of being delivered quickly and is less sensitive to economic cycles. It can therefore create more certain housing delivery. LBE should therefore strongly support proposals from a more diverse range of developers, including Build to Rent, in order to increase the number of approvals, in accordance with the recommendations of the Letwin Review (2018) and Housing White Paper (Fixing our Broken Housing Market 2017).</li> <li data-bbox="667 547 2033 818">• In addition, CLL highlight that Policy H11 of the London Plan sets the criteria which Build to Rent schemes must meet to follow the fast-track threshold approach in Policy H5 of the London Plan. If Build to Rent schemes are excluded from fast track, it is likely that both the total number of homes and total number of affordable homes delivered in Enfield will reduce due to a reduction in the number of Build to Rent schemes proposed (leading to reliance on a smaller number of conventional house builders) and an increase in the number of schemes following viability tested route. In respect of First Homes, paragraph 64 of the NPPF confirms that Build to Rent schemes are exempt from national requirements to deliver affordable home ownership products.</li> <li data-bbox="667 850 2033 1185">• TfL CD supports the inclusion of policy for the provision of Build to Rent developments within Enfield, including affordable housing in the form of Discounted Market Rent. The GLA's Affordable Housing SPG (2017) however recognises that the greatest need for private rental housing is for 1 and 2 bedroom homes. Build-to-Rent schemes should not therefore be required to meet the same need which has been identified for sale homes. Policy 4.1 of the Mayor's London Housing Strategy (2017) sets out the basis on which Intermediate Rental homes (including Discounted Market Rent) can be considered 'genuinely affordable'. No other definition of genuinely affordable is set out in planning policy or guidance. Policy H7 Section 1 should therefore confirm the Mayor's definition is to be used. In respect of First Homes, paragraph 64 of the NPPF confirms that Build to Rent schemes are exempt from national requirements to deliver affordable home ownership products.</li> <li data-bbox="667 1217 2033 1377">• TfL CD highlight that draft Policy H7 Section 2 is inconsistent with Policy H7 Section 1, which confirms Build to Rent schemes will be supported when they 'provide on-site affordable housing in perpetuity in the form of Discounted Market Rent at genuinely affordable rent level'. Whilst it is acknowledged that the London Plan does allow local authorities to require a portion of affordable housing as low-cost rent on Build to Rent schemes (Para 4.11.10), this approach must be justified</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>and as such the approach in draft policy H7 would need to do so. It is considered that requiring Build to Rent schemes to deliver conventional affordable housing tenures will make Enfield less desirable for Build to Rent developers resulting in reduced diversity and delivery of housing. Furthermore, the supply of much needed intermediate rental homes would be constrained. Consideration would be required as to the feasibility, viability and suitability of this approach.</p> <ul style="list-style-type: none"> <li>• Crosstree Real Estate Partners support the introduction of Build to Rent ('BTR') in the draft Local Plan which acknowledges this housing product as a new option for major developments and offers a lifestyle option for people who potentially look to rent in the Borough.</li> <li>• The Enfield Society supports this policy in principle.</li> <li>• Better Homes Enfield is not clear what the targets are for affordable housing on BTR schemes. What is the overall affordable housing target and what proportion should be Social Rent/London Affordable Rent, London Living Rent and Discount Market Rent? Without setting clear affordable housing targets for BTR it is not possible to establish how BtR will address housing need in Enfield as set out in the LHNA 2021. The Explanation note for 8.7.2 states that "Build to rent should provide a proportion of low-cost and London Living Rent homes" but no proportion is specified as there is no reference to the overall affordable housing policy at H2. The policy says BTR will be encouraged, so it is important that affordable housing targets are clearly set out.</li> </ul> <p><b>Wider community</b></p> <p>No comments received.</p>
Policy H8: Large scale and purpose built shared housing	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul>

Chapter or policy reference	Summary of main issues
	<p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comments received.</li> </ul>
Policy H9: Student accommodation	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comments received.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>The Enfield Society supports this policy in principle.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comments received.</li> </ul>
Policy H10: Gypsy and traveller accommodation	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The LVRPA would welcome involvement with this document if it is likely to impact land within the Park.</li> <li>Hertsmere District Council support planning to meet the full identified need of 21 pitches, but they are unclear how or why this should require a separate DPD. Sites should be identified through reg 18 stage and brought forward in the reg 19 plan. Unless LBE is able to own and manage new pitches itself, Hertsmere recommend any private any new private sites are small in scale, and not exceeding 5-6 pitches (benefits in terms of management, successful coexistence, and appeal to wider range of G&amp;T households).</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>The London Gypsies and Travellers organisation very much welcome that fact that the evidence base acknowledges the accommodation needs of Gypsy and Traveller families in the Borough and would support a Local Plan policy that seeks to provide culturally suitable accommodation for the</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>community. However, they have a number of comments at this stage, primarily the Local Plan policy should include the full extent of need. It notes the supporting text of Policy DM H10 makes reference only to the need for 21 pitches arising from families who meet the Planning Policy for Traveller Sites definition of Travellers. However, in order to be consistent with both NPPF and PPTS and meet the requirements of Section 124 of the Housing and Planning Act, Local Plans need to include evidence of need of both Travellers who meet the PPTS definition, and those who do not. This was tested recently in the Examination in Public of the New Southwark Plan, and Planning Inspectors recommended that the Local Plan policy on Gypsy and Traveller accommodation should explicitly acknowledge non-PPTS need. Therefore, they suggest the policy should set a target to meet the overall permanent need of 23 pitches.</p> <ul style="list-style-type: none"> <li>• The London Gypsies and Travellers organisation do not support the approach of a separate Gypsy and Traveller Local Plan, as this will put Gypsy and Traveller communities at further disadvantage in terms of accessing housing that is culturally appropriate and meets their needs, and therefore going against the Council's Equality Duties and consider all sites that are being assessed through the Local Plan process should be considered and evaluated for their potential to meet the need for Gypsy and Traveller homes. A range of options should be considered to accommodate the 23 permanent pitches, possibly across multiple small sites, and the stop over site of 6 pitches. The options for possible locations need to go through thorough consultation with Gypsy and Traveller families.</li> <li>• The City of London Conservators welcomes the Borough's Gypsy and Traveller accommodation needs assessment as part of Policy DM H10. In their experience many incursions and attempted occupations of Forest Land (especially upon the western edge of the Forest) seem to result from lack of such provision within the Enfield Borough.</li> <li>• The Hadley Wood Neighbourhood Planning Forum recognises that the needs Assessment in the Evidence Base appears to suggest a requirement for 21 pitches, but nil currently provided. This is a material increase from the need for 1 pitch identified in the 2008 needs assessment that is referenced in the latest London Plan, and the pitch requirement appears to reflect a desire rather than need. Furthermore, the Assessment does not discuss how the proposal the needs and interests of the broader community.</li> </ul>

Chapter or policy reference	Summary of main issues
	<p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Residents support the preferred approach, but by definition this segment of population are not (necessarily) static and so in particular tied to an individual borough and its administrative boundaries.</li> <li>The wider community consider that the planning of 21 pitches is appropriate.</li> </ul>

**Table A.11:** Summary of main issues – Chapter 9: Economy

Chapter or policy reference	Summary of main issues
<p>Policy E1: Employment and growth</p>	<p><b>Specific bodies (statutory)</b></p> <ul style="list-style-type: none"> <li>Areli on behalf of Blackrock and the GLA – highlight that there are significant unexplored opportunities in the untapped brownfield land supply - including intensification.</li> <li>Thames Water highlight unexplored greenfield opportunities.</li> <li>The GLA raised concern that the release of Green Belt sites to meet employment needs may make intensification unviable, therefore intensification sites should be allocated in the plan.</li> <li>The London boroughs of Newham and Waltham Forest – support the principle of safeguarding existing sites to meet identified needs.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>FERAA and the Enfield Society were sceptical of the principle of safeguarding existing sites to meet identified needs.</li> <li>CPRE, Conservative Group and several amenity groups oppose to the development of Green Belt sites, such as land west of Rammey Marsh and land east of J24 of the M25.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Several respondents highlighted the age of the Employment Land Review (2018) and the need to account for the evolving economic landscape (Brexit, Covid, etc) since then.</li> <li>• Several landowners expressed their discomfort on the assessed floorspace capacity for employment sites, with some expressing concern that the figures were too high and arguing for flexibility. They requested for further dialogue and engagement.</li> <li>• Prologis, SEGRO and developers of warehouses supports the employment strategy which seeks to deliver additional industrial and office floorspace in the borough.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community pointed out that there is the likely move away from office space by businesses looking to reduce costs after the pandemic and maximise the use of new technology for home and remote working, which have not been picked up in the plan.</li> <li>• The wider community acknowledge the increase nature of working from home, accelerated by Covid-19 will reduce the need for office space, avoiding the need to encroach on the Green Belt.</li> <li>• Respondents suggested there are no exceptional circumstances to justify releasing land from the Green Belt for employment development and wants brownfield land should be used instead.</li> </ul>
Policy E2: Promoting inclusive business and job growth	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The London borough of Brent viewed this policy as ‘an appropriate way for Enfield to ensure that industrial needs identified can be delivered’ in identifying new opportunities to provide for additional industrial floorspace, whilst also seeking to protect and make best use of existing floorspace.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Lansdown Land, SEGRO, and LBE Strategic Property Services expressed their support for the policy approach to protect SIL and supported SIL extension</li> </ul>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• The Universities Superannuation Scheme did not support the principle of SIL extension and argued for future flexibility.</li> <li>• The Hadley Wood Neighbourhood Planning Forum stressed that public transport links to important industrial locations is crucial and should be addressed.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No specific comments were received on this policy.</li> </ul>
Policy E3: Protecting employment locations and managing change	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The London borough of Brent viewed this policy as ‘an appropriate way for Enfield to ensure that industrial needs identified can be delivered’ in identifying new opportunities to provide for additional industrial floorspace, whilst also seeking to protect and make best use of existing floorspace.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Tarmac Trading, Henry Boot, and Goodman Logistics Development UK Ltd – expressed their support for the range of uses set out as permissible within SIL.</li> <li>• British Land and Goodman Logistics Development UK Ltd supported the policy approach to uses with in / adjacent to SILs not compromising integrity/ effectiveness of SILs. DTZ Investors offered a dissenting voice.</li> <li>• Areli for Blackrock and landowner consortium argued for a mechanism by which residential uses can be delivered on SIL to be clearly set out in this policy.</li> <li>• DTZ Investors also argued against blanket restriction on residential use.</li> <li>• The Enfield Society recognised that the principle of residential development potential of SIL is preferable to the loss of Green Belt.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Better Homes Enfield argued for specific and strict policies managing housing in SIL areas, arguing residential should be permitted where there is no loss of industrial floorspace and an increase in employment.</li> <li>• LBE Strategic Property Services provided general support to this policy.</li> <li>• Enfield Sport suggested that sports use such as: fitness clubs, gyms, climbing centres and five aside centres should be acceptable on employment sites.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No specific comments were received on this policy.</li> </ul>
Policy E4: Supporting offices	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments were received on this policy from specific consultees.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The Enfield Society and LBE’s Property Services supported this policy.</li> <li>• Cockfosters Local Area Residents Association and the Hadley Wood Neighbourhood Planning Forum questioned the relevance of this policy in the context of recent events.</li> <li>• Henry Boot, Hadley Wood Neighbourhood Planning Forum) argued that office development should be allowed outside town centres.</li> <li>• Notting Hill Genesis and Regenta argued for the specified active marketing period to be reduced from 24 to 12 months.</li> </ul> <p><b>Wider community</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• One individual objected to the protective stance of the policy on the grounds of increased homeworking and the popularity of residential conversions.</li> </ul>
<p>Policy E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The London borough of Brent viewed this policy as ‘an appropriate way for LB Enfield to ensure that industrial needs identified can be delivered’ in identifying new opportunities to provide for additional industrial floorspace, whilst also seeking to protect and make best use of existing floorspace.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Goodman Logistics Development UK Ltd, British Land, LBE Strategic Property Services – expressed their support towards the policy approach which encourages intensification.</li> <li>• The Hadley Wood Neighbourhood Planning Forum also expressed support for intensification, provided the infrastructure is appropriate and the impact on the locality is acceptable.</li> <li>• LaSalle IM objected to the requirement to retain businesses on site/ implement effective arrangements in the case of redevelopment.</li> <li>• British Land suggested a ‘where feasible’ modification to this requirement.</li> <li>• The Canal and River Trust supported the requirement for new development within Strategic Industrial Locations and Locally Significant Industrial Sites to integrate with, and enhance, blue &amp; green networks.</li> <li>• Better Homes Enfield urged that the policy be reconsidered because of the prohibition of housing development in SIL.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No specific comments were received on this policy.</li> </ul>

Chapter or policy reference	Summary of main issues
<p>Policy E6: Redevelopment of non-designated industrial sites</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The London borough of Brent viewed this policy as ‘an appropriate way for LB Enfield to ensure that industrial needs identified can be delivered’ in identifying new opportunities to provide for additional industrial floorspace, whilst also seeking to protect and make best use of existing floorspace.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>LBE Strategic Property Services – support the principle of this policy.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No specific comments were received on this policy.</li> </ul>
<p>Policy E7: Providing for workspaces</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The London borough of Brent viewed this policy as ‘an appropriate way for LB Enfield to ensure that industrial needs identified can be delivered’ in identifying new opportunities to provide for additional industrial floorspace, whilst also seeking to protect and make best use of existing floorspace.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>British Land indicated that the need to define what is meant by ‘workspace’ for the purposes of decision making was requested, and it was argued that small scale business space should be provided in mixed use neighbourhood contexts, rather than be required in SIL, ‘requirements for small workshops and quasi-office spaces in SIL may erode its capacity for strategically important industrial development and this must be avoided to meet identified needs for industrial development.’</li> <li>The Enfield Society and LBE Strategic Property Services expressed their in-principle support.</li> </ul> <p><b>Wider community</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>No specific comments were received on this policy.</li> </ul>
Policy E8: Local jobs, skills and local procurement	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comments were received on this policy from specific consultees.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>The Enfield Society, SEGRO and LBE Strategic Property Services – expressed their in-principle support.</li> <li>SEGRO suggested refinements to the policy and argued that the requirement for an ‘site-specific employment and skills plan’ may instead need to be secured by condition, as it may not be possible to confirm exact details of the number of trainees, weeks training etc, alongside the submission of a planning application.</li> <li>Notting Hill Genesis and Regenta Development argued that part 2 of the policy should be deleted, as it conflicts with draft policy E4 and would lead to unwelcome consequences.</li> <li>Some suggestions for improvement were received from local groups.</li> <li>Enfield Caribbean Association suggested that ‘the construction workforce who will physically implement the plan should reflect the demographics of the borough. Targets should be implemented, and sanctions applied to ensure compliance.’</li> <li>The Hadley Wood Neighbourhood Planning Forum advised that the term ‘local labour’ should be defined, and compliance verified.</li> </ul> <p><b>Wider community</b></p> <p>No specific comments were received on this policy from the wider community.</p>

Chapter or policy reference	Summary of main issues
<p>Policy E9: Fostering a successful evening and night time economy</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments were received on this policy from specific consultees.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• LBE Strategic Property Services – expressed their support.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• One respondent suggested that the night-time economy should be properly defined and expressed concern at potentially negative impacts arising from supporting the night time economy. They suggested that the plan should address how anti-social behaviour would be tackled.</li> </ul>
<p>Policy E10: Creating a smart and digitally connected borough</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments were received on this policy from specific consultees.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• LBE Strategic Property Services – expressed their support.</li> </ul> <p><b>Wider community</b></p> <p>No specific comments were received on this policy.</p>

**Table A.12:** Summary of main issues – Chapter 10: Town centres and high streets

Chapter or policy reference	Summary of main issues
<p>Policy TC1: Promoting town centres</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Hertfordshire County Council suggested that improvements to active and public transport links to high streets to promote their usage should be included within this policy.</li> <li>• Metropolitan Police Service (with reference to ‘designing out crime’) specifically support the reference to safety and security within the policy.</li> <li>• TfL Spatial Planning (with reference to ‘designing out crime’ support part 1d which refers to ‘managing streets and spaces to facilitate pedestrian and cycle movement, improve links to surrounding areas and reduce traffic flows along key routes’. They suggested the addition of ‘public transport’ before links to clarify the intention of the policy.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• TfL Commercial Development, W M Morrison Supermarkets Ltd and LBE Strategic Property Services – expressed their support.</li> <li>• Better Homes Enfield argued that the plan does not recognise the importance of Enfield Town as Enfield’s main shopping destination, or address practical elements such as car parking provision and servicing. They highlight scope for the plan to promote the greening of Enfield Town, support for green business, and ventures that promote sustainability.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community expressed support for independent shops, and highlighted the importance of encouraging businesses back into Enfield’s town centres.</li> <li>• One noted the site allocations relating to large grocery retailers throughout the borough, and highlighted implications for local household food needs.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>One highlighted that Aldermans Hill local centre functions as part of the wider Palmers Green town centre and suggested that the two should be considered in tandem.</li> </ul>
<p>Policy TC2: Encouraging vibrant and resilient town centres</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>Hertfordshire County Council suggested a positive addition could be improvements to active and public transport links to high streets to promote their usage, including for the night-time economy.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>W M Morrison Supermarkets Ltd, Notting Hill Genesis, and LBE Strategic Property Services expressed their support and agreement that large local centres should continue to provide service and uses to benefit the needs of local residents.</li> <li>LBE Conservatives identify a tension between encouraging town centres to develop as vibrant and economically successful hubs through this policy, and the proposed redevelopment of car park sites elsewhere in the plan. They argue that removing car parking from town centres and supermarkets will encourage shoppers to go elsewhere.</li> <li>Cockfosters Local Area Residents Association argue that support for small shops should be removed from the policy, as it would help small shops in general if their numbers were reduced.</li> <li>Notting Hill Genesis suggested that the policy be amended to remove the wording stating that proposals for residential uses at ground floor level will be refused, as greater flexibility is preferable.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Several members of the community expressed concerns at the loss of car parks and supermarket car parking proposed in other parts of the plan.</li> <li>One argued that the redevelopment of supermarkets (proposed as part of site allocations) would impact elderly and disabled residents, and force people to drive further.</li> </ul>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>One suggested that Enfield Town could be improved with more independent retailers and markets, and a better evening economy offer. They also pointed to the benefits of raising the quality of Enfield Town's retail offer.</li> </ul>
Policy TC3: Floorspace above commercial premises	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comments were received on this policy from specific consultees.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>LBE Strategic Property Services expressed their support towards this policy.</li> <li>Some respondents suggested uses and activities that would be beneficial for upper floors in town centre locations.</li> <li>The Hadley Wood Neighbourhood Planning Forum suggested that space above shops could also be used for leisure and entertainment ventures.</li> <li>Sport England expressed concern that the policy could be interpreted as preventing leisure uses above ground floors. They encourage an amended stance to permit above ground floor sports uses.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No specific comments were received on this policy.</li> </ul>
Policy TC4: Markets	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comments were received on this policy from specific consultees.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Crosstree Real Estate Partners LLP and LBE Strategic Property Services expressed their support.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Crosstree Real Estate Partners LLP argued that the requirement to preserve or lower rent for traders in instances of redevelopment does not align with London Plan Policy E9 and is outside the remit of planning policy.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No specific comments were received on this policy.</li> </ul>
Policy TC5: Meanwhile uses	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Hertfordshire County Council ‘welcomes Enfield’s consideration for mitigating against additional car usage.’</li> <li>• TfL Spatial Planning welcomed the statement that: ‘Uses which are not considered suitable meanwhile uses include vehicle parking’, although pointed out that it would help to include this point within the policy.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Modomo expressed support for the policy, but request the wording is strengthened with regards to housing to bring it in line with London Plan policy H3. Detailed suggestions for amendments were provided in their representation.</li> <li>• LBE Strategic Property Services expressed their support.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No specific comments were received on this policy.</li> </ul>
Policy TC6: Managing the clustering of town centres uses	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• NHS London Healthy Urban Development Unit expressed support for the policy, and specific support for the use of a planning condition where applications for hot food takeaways are permitted. However,</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>they indicated that it was unclear how the requirement for Cumulative Impact Assessments relate to the requirement for health impact assessment under Policy SP SC1. They requested that the London Plan requirement which controls new hot food takeaway uses within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school be part of the policy, and (with regards to paragraph 10.6.3) noted that, in addition to hot food takeaways, over concentrations of other uses, such as betting shops, pawnbrokers, pay-day loan stores, amusement centres and casinos can also have a detrimental impact on health and wellbeing and concentrations of these uses are often found in deprived areas.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• M Morrison Supermarkets Ltd and LBE Strategic Property Services – expressed their support.</li> <li>• Planware Ltd objected – arguing that limiting the concentration of hot food takeaways is unsound - would apply an over-generic approach to restrict development with little sound reasoning or planning justification. Restricting town centre uses within centres contradicts the NPPF and sequential approach. They observed that overconcentration is not defined, and no evidence is provided to show existing concentration levels in the borough.</li> <li>• The Hadley Wood Neighbourhood Planning Forum observed that it is unrealistic to require businesses such as food outlets to have no impact on neighbouring properties in terms of noise, smells, light pollution, parking, etc.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• One representation was received arguing that fast food and gambling venues should not be permitted in Enfield Town.</li> </ul>

**Table A.13:** Summary of main issues – Chapter 11: Rural Enfield

Chapter or policy reference	Summary of main issues
<p>Policy RE1: Character of the Green Belt and open countryside</p>	<p>Comments have been received from local organisations and the wider community.</p> <p>The comments received generally raise concerns that the policy contradicts with the London Plan and that this policy is inconsistent with Green Belt release related to policies PL9 and PL10.</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• None noted.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• LBE Strategic Property Services expressed their support.</li> <li>• The Hadley Wood Neighbourhood Planning Forum support the policy, but have observations. They agree with the approaches of the policy but raise concerns of how the policy conflicts and can be applied in relation to the proposal related to green belt release to deliver new homes.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Respondents indicate that there are inconsistencies in the Local Plan with both policies PL9 and PL10 – so therefore infringes the conditions of 1a-1f of this policy.</li> <li>• Respondents object to the principle of this policy. They indicate that the approach towards development in the Green Belt is contrary to the London Plan 2021. They indicate that the Mayor of London strongly supports the continued protection of London’s Green Belt which performs a number of functions including combating the urban heat island effect, growing food and providing recreational space. They also recognise that the London Plan Page 314 Policy G2 states ‘The Green Belt should be protected from inappropriate development’ and ‘exceptional circumstances are required to justify either the extension or de-designation of the Green Belt’. They suggest that the Enfield Local Plan does not show any ‘exceptional circumstances’ and does not appear to have explored more suitable areas for development.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Respondents suggest there is contradiction to Enfield's most recent Characterisation Study as this states that "The existing Green Belt boundary should be retained and protected, and future development and land use changes resisted". They suggest if this site is included in the Local Plan, this statement of the Council would be completely overturned.</li> <li>• The Green Belt and wild open spaces should be made a priority to increase much needed biodiversity.</li> <li>• Objections received as developing on Green Belt is against the Mayor's Transport Strategy which encourages people to walk and cycle more.</li> <li>• Comments from the wider community received recognising the importance to keep greenbelt conserved in terms of separating the area from Barnet and Potters Bar.</li> </ul>
<p>Policy RE2: Improving access to the countryside and green corridors</p>	<p>Comments have been received from local organisations and the wider community. Overall, there is support from local organisations in the main with this policy, most concerns are arising from the wider community with concerns it conflicts with Local Plan policies that will de-designate areas of the Green Belt.</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• None noted</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• London Borough of Enfield Strategic Property Services support this policy.</li> <li>• The Hadley Wood Neighbourhood Planning Forum support the policy but have observations. They agree with the approaches of the policy but raise concerns of how the policy conflicts and can be applied in relation to the proposal related to green belt release to deliver new homes.</li> </ul> <p><b>Wider community</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Developing parts of the Green Belt will make these locations inaccessible, contrary to the aspirations of the Plan as a whole.</li> <li>• The policy is inconsistent with the Local Plan, policies PL9 and PL10 infringe upon this policy.</li> <li>• The policy does not recognise the value of Merryhills Way to local people. It is highly valued for its contribution to physical and mental health benefits.</li> </ul>
<p>Policy RE3: Supporting the rural economy</p>	<p>Comments have been received from local organisations and the wider community. There is support from local organisations in the main with this policy, concerns addressed from the wider community relate to the potential negative impact of PL9 on this policy.</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• None noted.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• London Borough of Enfield Strategic Property Services support this policy.</li> <li>• The Hadley Wood Neighbourhood Planning Forum support the policy with observations. They agree with the approaches of the policy but raise concerns of how the policy conflicts and can be applied in relation to the proposal related to green belt release to deliver new homes.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community expressed that the policy is inconsistent policy PL9 as it will destroy the local economy rather than support.</li> </ul>
<p>Policy RE4: Farm diversification and rural employment</p>	<p>Comments have been received from local organisations which support this policy, concerns address to how this policy can be applied in relation to green belt release to deliver new homes.</p>

Chapter or policy reference	Summary of main issues
	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• None identified.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• London Borough of Enfield Strategic Property Services support this policy.</li> <li>• The Hadley Wood Neighbourhood Planning Forum support the policy with observations. They agree with the approaches of the policy but raise concerns of how the policy conflicts and can be applied in relation to the proposal related to green belt release to deliver new homes.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No responses identified directly related to this policy.</li> </ul>

**Table A.14:** Summary of main issues – Chapter 12: Culture, leisure and recreation

Chapter or policy reference	Summary of main issues
Policy CL1: Promoting culture and creativity	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Lee Valley Regional Park Authority is supportive of the Plan's recognises of the contribution that the leisure and visitor experience can make to economic growth and this is welcomed. It is important that policy enables both the protection of existing facilities and the growth and expansion of new attractions. It would be helpful if both strategic and development management policies could offer more specific support for the Regional Park in this respect. Strategic Policy CL1 Promoting culture and creativity seeks to direct new arts, culture and entertainment towards the Borough's regeneration areas and town centres which is understandable given the accessibility of these locations. The Regional Park contains established venues and locations for leisure and entertainment and should</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>also be identified as a suitable location, in particular the Lee Valley Leisure Complex, a strategic location within the east of the Borough.</p> <ul style="list-style-type: none"> <li>• LB Waltham Forest is supportive of the approach taken for the development of culture, leisure and recreational development in the borough in the plan period and will continue to work collaboratively with the London Borough of Enfield to assist the realisation of aspirations in and around the borough boundary.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Better Streets for Enfield and the Enfield Cycling Campaign are supportive of the policy and suggest the following: <ul style="list-style-type: none"> <li>- sustainable tourism and in particular walking and cycling activities are encouraged and supported</li> <li>- all cultural, leisure and recreation facilities (extant and planned) have ample secure and covered cycle parking</li> <li>- car parking at these venues is minimised.</li> </ul> </li> <li>• The Theatres Trust is supportive of the policy and suggest minor amendments to part 2a - 'a. the use is identified as surplus to requirements' or 'the use is identified as surplus to requirements and is no longer economically viable or capable of being operated on a community or not-for-profit basis.'</li> <li>• Enfield Ignatians Rugby Football Club note beyond Sport the Village and playing fields could make a significant contribution to Culture and Arts in the Borough. CL1.3 The Enfield Playing fields and Sports Village presents an excellent opportunity for outdoor art culture and performance activities, for example sculptural waymarking on activity routes within the playing fields, and festivals.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No specific comments were received on this policy.</li> </ul>



Chapter or policy reference	Summary of main issues
Policy CL2: Leisure and tourism	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comment</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>There was general support from general bodies/other organisations that tourism is an important sector of the rural economy that has great potential for further growth. They consider that the site could provide tourist accommodation or tourism related employment to support the rural economy in this area of Enfield.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>The wider community recognised that further culture, leisure and recreation opportunities, particularly for teenagers and young adults whose lack of meaningful activities are being a trigger for anti-social activities to support increasing population should be identified.</li> </ul>
Policy CL3: Visitor accommodation	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The Lee Valley Regional Park Authority notes that the Policy CL3 Visitor Accommodation makes no reference to the Regional Park as a location for potential visitor accommodation facilities and yet these feature within a number of sites in the Park, including at Pickett's Lock. PDF Area proposals outline further opportunities for a range of provision across a wide range of accommodation types, and indeed hotel, glamping and lodge style accommodation is often an integral part of major leisure and sporting developments. It is being actively considered as part of The Wave proposals. Policy CL3 should be amended to include a reference to the Regional Park under CL3 point 4, (see text in red bold font). Proposals for camping facilities and the conversion of existing buildings to accommodate visitors in rural parts of Enfield will be supported especially within Enfield Chase and the Lee Valley Regional Park in line with policies RE4 and PL8.</li> </ul> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Cockfosters Local Area Residents Association note the need to protect hotel accommodation.</li> <li>• Enfield Ignatians Rugby Football Club note that CL3 Enfield Playing Fields may present an opportunity for an appropriately located hotel serving the Sports Village and Southbury. At 12.2.2 major visitor accommodation (e.g. hotels) outside town centres will be subject to the sequential test. We are concerned that whilst an appropriately located hotel in walking distance to public transport within or adjacent to the Sports Village would meet the general description of both CL3 1 and CL3 2, such a beneficial proposal, potentially capable of cross funding the Sports Village or contributing to its revenue subsidy may fail the sequential test if an alternative site were available in Enfield town. CL3 1 ...And other locations such as the proposed Sports Village at Enfield Playing Fields which are within walking distance...</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No specific comments were received on this policy.</li> </ul>
Policy CL4 Promoting sporting excellence	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The LVRPA supports the direction of this policy as it offers potential support for the authority's current investment proposals for Pickett's Lock, which include: The Wave. However, the Authority would wish to see a much more extensive area included given the leisure and sporting activities across the wider site. It is also confusing that explanatory text to the policy groups together the Hotspur training ground, Pickett's Lock, Enfield Playing Fields and Firs Farm as suitable locations for the development of world-class sports villages – this is not a proposal that the Authority has identified for Pickett's Lock.</li> <li>• TfL Spatial Planning object to SA62 Land at Tottenham Hotspur FC training ground as the site is likely to be dependent on car access due to the relatively poor connectivity by active travel or public transport with a PTAL of 1a-b. The site proposals (including ancillary related facilities) should exclude major trip generating uses unless there is substantial investment in viable public transport and active travel improvements.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Sport England does not consider that the draft complies with the NPPF and therefore does not consider the document to be sound and objects to the draft. Specifically: <ul style="list-style-type: none"> <li>○ policies relating to indoor and outdoor sport facilities, including playing fields, should be included within the Draft Local Plan and these should be based on a robust and up-to-date evidence base, such as the Playing Pitch Strategy (PPS) and indoor/built sport facility strategy, that would steer which types of indoor and outdoor sports facilities need protecting, enhancing and where new facilities, if any, are needed to meet current demand and the demand from future growth.</li> <li>○ the PPS is not included within the list of evidence base documents stated to inform the Local Plan, although Sport England does appreciate that there are some references to the PPS in the draft and that some elements have been referred to in the Blue and Green Infrastructure Strategy. The Local Plan also appears to suggest different recommendations/actions than what appears in the Draft Local Plan, particularly in relation to identifying a hierarchy of sporting hubs, including sites that do not appear in the PPS, such as the Tottenham Hotspur Training Ground and allocating sites for development that the PPS clearly seeks to protect and enhance, such as the Church Street Recreation Ground. As a result, Sport England has no alternative than to consider that the policies that relate to sport facilities are not informed/justified by robust and up-to-date strategies therefore consider that the policies are not sound at this point in time. Sport England, therefore, strongly recommend that the Council, at least, undertake a review of the PPS and develop an indoor/built facility strategy to inform the Local Plan to ensure that the next draft (Regulation 19) is in sound.</li> <li>○ 1. b. states publicly accessible strategic sport and leisure facilities would be provided to meet the needs of the growing population would be based on a location hierarchy however this hierarchy is not discussed in the PPS and could result in certain facilities being located in these location that are not strategically identified as required in these location. The PPS does not recommend facilities are required at Tottenham Hotspur’s Training Facility and only certain improvements are cited at Enfield Playing Fields and Firs Farm. It appears, therefore, that this element of the policy has not been informed by the strategy/evidence base.</li> </ul> </li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>○ concerns with section 2. since it is not clear if the expansion of the Tottenham Hotspurs Training Centre would meet locally identified needs as explained above. In addition, if the expansion results in the loss of sports facilities then in order to meet the NPPF, paragraph 99, and Sport England Policy it must be robustly demonstrated that the facility that would be lost is either surplus in an assessment or replaced, especially since the PPS does not highlight a community need for the proposed facility at present. Please note that lack of use should not be seen as necessarily indicating an absence of need for a specific sports facility in the locality. Such land can retain the potential to provide to meet current or future needs.</li> <li>○ SA56: Land at Picketts Lock, any new sports and leisure facilities should meet a strategically identified need.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>● CPRE London support the removal of reduction of surface car parking at land identified for promoting sport excellence at Picketts Lock but does not support development which would be inappropriate for development in the Green Belt, land should remain open. SA56: Land at Picketts Lock should be explicit that any 'new sports, recreation and leisure facilities' would need to comply with Green Belt policy.</li> <li>● CPRE London objects to SA62: Land at and within the vicinity of Tottenham Hotspurs Football Club training ground as it is in the Green Belt which is performing an important function. It should not be subject to inappropriate development. It should certainly not be removed from Green Belt. CPRE London highlight that it does not appear to be a genuine allocation for development of "professional sport, recreation and community sports/leisure uses": rather, it appears to be an allocation aimed at enabling the expansion of the football club's training facilities. There is no need to allocate this site within the Local Plan – and indeed this allocation is inappropriate and it should be removed. If Tottenham wish to expand the appropriate route would be via a planning application.</li> <li>● The Metropolitan Police Service for designing out crime support the reference to safety and security set out in the policy</li> <li>● Thompsons of Crews Hill objects to this policy.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li data-bbox="667 288 2033 488">• Enfield Road Watch object to the allocation of 42.5 hectares of Green Belt for “professional sport, recreation and community sports/leisure uses” At present the Whitewebbs Golf course is open land, well-used and enjoyed by the public for outdoor recreation. ERW have concerns that fencing off portions of this site would impact the openness of the Green Belt. The existing Spurs facility already includes a number of inappropriate built structures in the Green Belt and there appears to be potential for more inappropriate structures on the former Whitewebbs Golf Course.</li> <li data-bbox="667 520 2033 855">• Enfield Ignatians Rugby Football Club, recognises the exciting opportunity to develop a Sports Village, integrating a number of council assets, in a central accessible location, delivering Borough wide benefits, most obviously in Sport, Health and Wellbeing, key elements of the Blue and Green Strategy, and with careful master planning and design encouraging the multiple use of the facilities creating opportunities in Education, Business development, Tourism, and Community, Social and Cultural benefits. However, they also consider there is the need to protect and enhance the playing fields from running into disrepair and being unsafe due to increased casual leisure use generated by the proposed neighbouring developments; to create a physical environment which the Council will be able to manage efficiently. The need to advance the quality of the playing pitches and ancillary facilities in line with the existing and to be review Playing Pitch strategy.</li> <li data-bbox="667 887 2033 1158">• Enfield Ignatians Rugby Football Club raises concerns around the concept of a “hierarchy of priority locations” but neither the policy nor the explanatory text provides any guidance to interpret this phrase. We believe it is intended to suggest that the facilities at each of the locations have a national, regional, sub-regional or Borough wide importance due to the quality, scale and draw of the facilities; not ambiguously the order or preference of the Plan to allocate investment. THTC is not currently publicly accessible and does not meet the needs of (the current or) growing population. The proposals at THTC and Picketts Lock are both private sector commercial projects whereas the Sports Village will be a public sector led.</li> <li data-bbox="667 1190 2033 1382">• Tottenham Hotspurs Football Club (THFC) supports the principle of their training centre and adjoining land as a key facilitatory and contributor towards the development of “first class” strategic sport and leisure facilities. THFC supports this aspect of the Policy. However, the policy suggests that the strategic sport and leisure facilities should be publicly accessible. It is outlined in the attached Policy Designation Document that the existing Training Centre provides community access to the Training Centre in a variety of forms and THFC will continue to provide such community access both as part of</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>the existing operations and future development. However, in order to protect professional sporting environment, any public access must be managed in an appropriate manner. Therefore, whilst THFC support public access, this can only be on the basis of its compatibility with the professional sporting environment that is the main focus of the Training Centre use. It is necessary for the Policy to recognise that public access should be managed in a way that is compatible with the professional sporting function of the training centre.</p> <ul style="list-style-type: none"> <li>• THFC recognises the Policy requires optimising access to, and through the designated site by pedestrian and cycle. Again, THFC are supportive of ensuring appropriate access to the site, and support improvements to such, although access through the site by the public will need to be managed where such is required beyond any existing public rights of way. This again is to protect the professional sporting function of the area. Seeks modifications to Criterion B to clarify that public access should be managed. In addition, the Criterion should remove the Training Ground from the hierarchy of public sporting locations as presently drafted the Policy suggests that THFC's Training Centre is a key public sports facility and will be so in the future.</li> <li>• THFC support the exceptional circumstances proposed identification of their Training Ground and adjoining land as being an area of sporting excellence where further associated development will be supported in principle, subject to a range of development management criteria. Notably, the land designated for sporting excellence should be extended to incorporate the former Whitewebbs Golf Course, creating a single site-wide allocation.</li> <li>• Friends of Forty Hill Park object to SA62 as it is inappropriate for THFC to expand and damage more of the local area. Lack of public access to their area of Forty Hill.</li> <li>• The Wave welcomes the policy including the reference at 1B to Picketts Lock.</li> <li>• The Enfield Society support the culture, leisure and recreation policies, but has some concerns about the proposed activities at Whitewebbs Lane, which would be inappropriate if they lead to loss of the openness of the existing Green Belt.</li> <li>• Local politicians object to the policy in particular to it allocating SA62 as it proposes the redesignation of Green Belt for housing and other purposes. These sites are part of historic Enfield Chase, which is</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>unique in the southeast and played an important role in the development of Enfield. It is a rare and valuable landscape asset, and its loss would cause permanent harm not only to the Green Belt, but also to the very character of the borough.</p> <ul style="list-style-type: none"> <li>• Barnet and Southgate College wouldn't rule out the development of recreational and sporting facilities in Crews Hill or other rural parts of Enfield, but would like to see provision for retaining or developing sports pitches for public use, closer to existing town centres and nodes of public transport.</li> <li>• LBE property services support the policy</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Residents objected to this policy because it transfers Whitewebbs Park, a public amenity, into private management</li> <li>• Objections were also received in relation to the proposed crematorium which involves a loss of sports facilities. As currently worded, SA59 is contrary to policy CL4 as it identifies Firs Farm as facilitating and contributing towards developing sport and leisure facilities in Enfield.</li> <li>• Residents objected to the site allocations contained in this policy as the loss of the sites would cause permanent harm not only to the Green Belt but to the character of the borough</li> <li>• Objections were received from the wider community on this policy as all of which propose the designation of Green Belt for housing and other purposes. Vicarage Farm/ Merryhills Way footpath are much used by residents for exercise and relaxation, physical and mental health benefits would be destroyed by development.</li> <li>• Residents supported this policy and highlighted that the council is correct to promote sport and recreation</li> <li>• Residents questioned how the creation of an academy for female footballers be described as a benefit to the wider local community. It is a benefit to Tottenham and involves the loss of a significant amount of green belt for what will almost certainly be a "closed" operation.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>Residents expressed concern over at how much community access is going to be available and how much the community will benefit from this expansion.</li> <li>Residents think the policy is an excellent move as Golf is a sport which reserves a vast quantity of Land for a tiny number of people. Enfield currently has seven golf courses: reducing that number to four or five could help meet the areas housing need, without genuinely disadvantaging anybody.</li> </ul>
Policy CL5: Sport, open space and recreation	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>Sport England objected to the policy. They consider that specific policies relating to indoor and outdoor sport facilities, including playing fields, should be included within the Draft Local Plan and these should be based on a robust and up-to-date evidence base, such as the Playing Pitch Strategy (PPS) and indoor/built sport facility strategy, that would steer which types of indoor and outdoor sports facilities need protecting, enhancing and where new facilities, if any, are needed to meet current demand and the demand from future growth. These strategies would provide a clear strategy and action plan with delivery priorities for playing pitches and built sport facilities within the borough and therefore should direct the objectives and policies of the Draft Local Plan.</li> <li>Sport England recommends that LBE undertakes a review of the PPS and develop an indoor/built facility strategy to inform the Local Plan to ensure that the next draft (Regulation 19) is in sound.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Barnet &amp; Southgate College notes that their college lack suitable sports fields that are in an equally accessible location and currently have to transport students by bus to facilities (New River, Coles Park) in the London Borough of Haringey. Whilst they wouldn't rule out the development of recreational and sporting facilities in Crews Hill or other rural parts of Enfield, they would like to see provision for retaining or developing sports pitches for public use, closer to existing town centres and nodes of public transport.</li> </ul> <p><b>Wider community</b></p>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• A number of residents raised concerns regarding SA59: Firs Farm recreation ground (part) the crematorium location and loss of sports facilities.</li> <li>• Further concerns regarding SA61 (Church Street Recreation Ground) noting that the plan mentions that development proposals that result in the loss of sports and recreational buildings and land will be resisted unless: <ul style="list-style-type: none"> <li>○ a. an assessment has been undertaken which has clearly shown the facilities to be surplus to requirements; or</li> <li>○ b. the loss resulting from the proposed development would be replaced by equivalent or better provision in a suitable location; or</li> <li>○ c. the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</li> </ul> </li> </ul>
Policy CL6: Protecting and attracting public houses	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• None noted.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Crosstree Real Estate Partners broadly support the concept of ensuring the replacement or re-provision of a public house is of comparable character and quality as the existing public house and has an appropriate amount and configuration of floorspace. However, they question whether it is feasible to make it a requirement that the replacement or re-provision of the public house must be of comparable character and quality based on its existing context, when the existing quality of the public house has an opportunity to be further improved and where a regeneration scheme could improve the quality of the wider site within which the public house is situated.</li> <li>• Campaign for Real Ale (CAMRA) welcome Policy CL6 but recommends some minor amendments. They suggest that the minimum three-year marketing period is a particular strength. However, the policy should specify that that the pub must have been marketed at a price reflecting the 'going rate'</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>for pubs of that type in the area to be effective. Failure to include this clause will give rise to risk of the building being marketed for a higher figure that makes pub use economically unviable. It should also refer to London Plan Policy HC7, stating that any development effecting public houses should also be compliant with it.</p> <ul style="list-style-type: none"> <li>• CAMRA strongly object to the IIA findings which states without evidence that the provision of public houses and nightclubs may encourage residents and visitors to lead unhealthy lifestyles. In 2016 CAMRA commissioned research from Professor Robin Dunbar of Oxford University on the role of pubs at the heart of their community. The report found that pubs play a key role in facilitating friendships and that those who have a local pub are happier, more trusting and better connected to their community, many also provide healthy home cooked food commensurable to any restaurant. It sets out that moderate levels of drinking have been associated with improved physical health and that the absence of public houses can cause unhealthy drinking patterns in homes. Removing public houses does not remove alcohol from society but the provision of regulated public houses provides people access to regulated environments for drinking and socialising. There is therefore no evidence that having public houses encourages unhealthy patterns of drinking and poor health. Recommend that reference to public houses is removed entirely from IIA finding 2.91.</li> <li>• CAMRA congratulates the council's progress on the LP.</li> <li>• The Enfield Society support the culture, leisure and recreation policies</li> <li>• LBE property services support the policy</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Resident was not sure that the policy should be a priority for the council, as it is not happening. Pubs are closing or being converted.</li> </ul>

**Table A.15:** Summary of main issues – Chapter 13: Movement and connectivity

Chapter or policy reference	Summary of main issues
Policy T1: Promoting sustainable transport	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The London borough of Barnet welcome the promotion of sustainable travel and will seek to work with Enfield to improve orbital connectivity, including support for cross boundary east-west links for active modes of travel and public transport.</li> <li>• Broxbourne Council note it has prepared a Transport Strategy to underpin its own Local Plan (adopted June 2020). The modelling work underpinning that Strategy indicated a need for significant upgrades to the A10 north of Junction 25 in order accommodate the planned growth in Broxbourne. They indicated a number of other pinch-points across the network. Given the very high levels of growth proposed within Enfield, there is a possibility that the cumulative or spill over impacts on the highways network within Broxbourne could be significant. They would be grateful for early sight of your transport modelling to understand those implications.</li> <li>• Broxbourne Council notes that the 12-hectare employment site allocation SA52: Land West of Rammey Marsh (page 372) is proposed to encompass the Small River Lea. Broxbourne Council is currently preparing an Area Action Plan for Waltham Cross and the Small River Lea has been identified as having potential as an active travel corridor between our two boroughs under the M25. They would be grateful if Enfield Council could consider how this could be accommodated as a part of evolving masterplans for site SA52. They realise that there may be implications for any proposed new M25 junction and would welcome a discussion regarding this.</li> <li>• Hertfordshire County Council fully supports the ambition of Enfield on this policy and are positive of the commitment being made to supporting sustainable transport in relation to growth. This is similar to the approach being taken by HCC in the development of our Growth and Transport Plans, which support their Local Transport Plan (LTP4). As suggestions, they would encourage Enfield to strengthen this policy through an amendment to 1c, with the addition of committing to improving public transport, and to 2 through more focus on what Enfield is seeking to deliver on active travel.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• TfL support Enfield Council’s expectation that new development will be “car-free (or offer a low level of parking provision)”, in accordance with London Plan Policy T6, GG2, and the Mayor’s Transport Strategy.</li> <li>• TfL have concerns about the lack of detail on some strategic transport issues. There is a need to confirm that London Plan maximum standards for car parking and minimum standards for cycle parking will be applied (or an even more ambitious approach if desired). Clarification is also required on whether projects such as east-west transit are still being promoted and if so, how they will be delivered. They previously expressed concerns about viability and a lack of commitment and funding, particularly in the current climate.</li> <li>• TfL and GLA have major concerns about some of the growth areas identified in rural parts of the borough which are less well connected by public transport and would require both substantial investment in transport infrastructure and services, and a restrictive approach to car parking in order to achieve the objectives of Good Growth. The high level of investment in active travel and public transport which would be required may not be realistic or viable in the long-term. There is a real risk that these areas could: become car dependent, have poor access to key services and put further pressure on the road network. We understand that further assessment work is underway, but as they currently stand, we would be likely to object on strategic transport grounds to proposed growth areas at Crews Hill and Chase Park, as well as the employment site at land east of junction 24.</li> <li>• TfL welcomes Enfield’s commitment to meeting the Mayor of London’s Transport Strategy objectives to deliver a transport network that improves the health and wellbeing of all Londoners and to achieve an 80% mode share for active and sustainable travel by 2041. We are pleased to see the requirement that development will be expected to contribute to these aims. However, it would be helpful to mention the Mayor’s ambition to achieve Vision Zero and to give greater force to these requirements by including them within a policy rather than being included solely in explanatory text.</li> <li>• TfL broadly welcome the contents of this policy including the safeguarding of existing and future transport land, ensuring that major development contributes to the delivery of a wide range of transport projects including Crossrail 2 and new public transport infrastructure or services, as well as support for car free development or low levels of parking provision. However, it is important that the approach to parking states explicitly that London Plan maximum standards for car parking will be</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>applied, to ensure compliance with London Plan policy T6. Any car parking should provide active electric vehicle charging points at a minimum of 20 per cent of spaces and the remaining 80 per cent should provide passive provision. Construction Logistics Plans and Delivery and Servicing Plans should be submitted alongside planning applications to detail how the impact of road based freight can be mitigated and maximum use made of the alternatives.</p> <ul style="list-style-type: none"> <li>• TfL note the policy should also be explicit that mitigation in the form of new infrastructure or funding may be required to address the impact on rail stations or bus services in order to provide increased capacity or improved access. This does not just apply in areas of low public transport accessibility as suggested in part 2b, and includes stations such as Southbury, Enfield Town, Edmonton Green and Silver Street served by TfL Rail/London Overground where substantial growth is proposed. Bus priority measures should also be considered for funding as an incremental approach to improve journey times and reliability at a much lower cost than a full-scale transit project.</li> <li>• TfL note the aspiration to provide frequency improvements on the Enfield Town/Cheshunt services. Although the potential for off peak improvements is being discussed with rail industry partners, this cannot be guaranteed at this point and remains subject to further consideration of its economic and financial case. We currently have no firm plan to increase peak service levels further but will keep this option under review. Currently our ability to enhance and invest in the West Anglia service is heavily constrained by the conditions of our latest funding deal with central government; the extent to which this constraint is relaxed depends on how well demand recovers.</li> <li>• TfL note the current status of the Crossrail 2 project and any updates on safeguarding are available on the Crossrail 2 website. Some site allocations may be affected by safeguarding updates so these will need to be taken into account when they are published by the Secretary of State.</li> <li>• TfL support the Council's desire to improve air quality and reduce car dependency as it is one of the most significant issues facing all residents in the borough. However, they are concerned that the challenges related to the lack of transport infrastructure to support access to sites proposed for development has not been considered fully or given appropriate weight.</li> <li>• GLA welcome the commitment to deliver a greater provision of electric charging points to encourage the shift away from petrol vehicles, but greater public transport provision to key development</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>locations is the only solution to reduce car dependency locally and development to date has done little to address this.</p> <ul style="list-style-type: none"> <li>• GLA note the aspiration of the draft local plan to support growth and enable people to get around by walking, cycling, and public transport is welcomed. In particular, the approach set out in the draft local plan to further reduce car use in line with the Mayor’s targets for 2041 and to implement the Healthy Streets Approach.</li> <li>• GLA have concerns about the lack of detail on some strategic transport issues. There is a need to confirm that London Plan maximum standards for car parking and minimum standards for cycle parking will be applied (or an even more ambitious approach if desired). Clarification is also required on whether projects such as east- west transit are still being promoted and if so, how they will be delivered. Transport for London (TfL) previously expressed concerns about viability and a lack of commitment and funding, particularly in the current climate.</li> <li>• The London borough of Waltham Forest is highly supportive of the aims of the Movement and Connectivity Chapter and are delighted to see reference to the aim of achieving an 80% mode share towards sustainable travel including walking, cycling and public transport use by 204. They also pleased to see reference to car free development in the period too which will help to progress the modal shift in the Local Plan period and beyond.</li> <li>• The London borough of Redbridge support the proposed measures regarding transport improvements and active travel. It should be noted that major transport projects are amongst the types of developments which have the potential to adversely affect Epping Forest SAC.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Countryside Properties agrees with the wording of draft Policy T1, and in particular the shift to car-free development and the provision of initiatives such as car clubs and well designed. Through the delivery of the Alma Estate regeneration, these elements have formed an integral part of the design approach. It should be highlighted however, that whilst the encouragement of investment in public transport infrastructure is welcomed, it is noted that some locations in the borough are more suited to public transport access and investment than others. Sustainable brownfield sites near or close to</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>existing transport nodes for example, are considered more suitable for investment and growth, than less accessible Green Belt and edge of Green Belt locations.</p> <ul style="list-style-type: none"> <li>• Better Streets for Enfield and the Enfield Cycling Campaign note in terms of any new school, housing development and so on the language could be strengthened further. If, for example, a new primary school has bike routes to it and so on it is helpful but is somewhat mitigated against if there is a car park space for every member of staff. ‘Access to’ active travel and public transport is not quite the same as the new priority established in the proposed highway code). We agree that choosing to walk, cycle or take public transport requires investment in these modes. They commit to the Mayor of London’s Transport Strategy objectives to deliver a transport network that improves the health and wellbeing of all Londoners and to achieve an 80% mode share for active and sustainable travel by 2041. There is little to disagree so they support this section.</li> <li>• Landowners are supportive of the requirements of this policy, to achieve these aims but consider that improvements to the wording would reinforce the Borough’s position and contribute more positively to the requirements for sustainable development.</li> <li>• Morrisons Group supports the Council’s vision to deliver and promote sustainable transport throughout the Borough. The current drafting of Policy T1 states that new development is expected to be car free or offer a low level of parking provision. The Morrisons site at Southbury Road is well located for public transport, however customer parking will be needed to ensure the store is operationally viable. In relation to residential uses a completely car free development is unlikely to be commercially viable in this location, notwithstanding the public transport connections.</li> <li>• Some Landowners consider that the approach set out policy T1 seeking car-free development as the starting point in new development proposals is fundamentally flawed, lacks evidential justification and goes beyond what is required within the London Plan, which only seeks car-free development where the site is already well-connected by public transport.</li> <li>• Landowners and developers note that the policy T1’s starting point is that development should be car-free, which goes much further than the London Plan’s starting point of car free where the site is already well connected by public transport. This Council’s policy to create car-free developments from</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>the start is not in the realm of reality. Enfield is an outer London borough which is not well connected by London Transport, this is a fact.</p> <ul style="list-style-type: none"> <li>• Landowners mentioned that the stated aim of new development being provided as car free also needs to be understood in the reality of the allocations policies, which include building on existing car parks. They recognise that the result of such allocations will be a considerable net loss of existing car parking provision as well as no/little new car parking spaces being provided. As a consequence, this will create enormous levels of parking congestion on-street, to the significant detriment of residents, businesses and cycle lanes, and gives rise to the very real risk of compromising highway safety.</li> <li>• Landowners note the Part 1 c - car free - plan should acknowledge that some parking will be required in certain circumstances (such as industrial development, given 24/ 7 operation and shift work). There is also the need to consider operational vehicles. Part 1 d - development should reduce traffic, but they recognise it is not always possible or desirable from an industrial development perspective, especially as intensification will mean more traffic movement. Landowners recommend that Policy T1 is refined to allow for appropriately managed and mitigated industrial intensification to come forward as this would currently be prevented by the wording of the draft policy. Part 2a - contribution to 4 tracking - policy should be adapted to state 'where reasonable and appropriate', to ensure that only major development that would generate demand for/benefit from such improvements contributes to their delivery.</li> <li>• The City of London Conservators understand the desire to maintain and improve the economic potential of the borough. In relation to the Forest and the EFSAC, the Borough's location with access to the M25 and A406 would be attractive to businesses looking to service London. The CoL Conservators are concerned about the impact of such new business will have on increased traffic on these roads which also dissect the Forest and have a major effect in terms of nitrogenous air-pollution. The CoL Conservators note that the HRA does not reach firm conclusions on this issue and detailed traffic modelling is required to understand the potential for increased traffic from workers coming out of the Borough to attend work at potential new industrial or office sites or the operations of such sites along these traffic corridors.</li> <li>• The CoL Conservators is concerned that any increases in the form of industry, new office provision or increased retail, especially on the Borough's constrained eastern side, might lead to future proposals</li> </ul>



Chapter or policy reference	Summary of main issues
	<p>to consider the Northern Gateway Access Road (NGAR) provision between the A10 and M25. The Conservators remain clear that such a proposal would have adverse impacts on the Forest and, therefore, any future development in the Local Plan must work within the current east-west road constraints and, as discussed at the Examination-in-Public for the North-East Enfield Area Action Plan (NEEAAP) in 2014. They recommended that solutions for access to new development need to rely on sustainable transport options.</p> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Residents are concerned there are no infrastructure and transport improvements listed in the new Enfield Local Plan. They indicate that minor improvements to the local infrastructure have failed to prevent houses from being repeatedly damaged by surface flooding over many years. Sewage periodically spills onto the rail station platform when the main sewer from Crescent West gets blocked, which happened most recently on 27 July 2021. Walkability in Hadley Wood is in the lowest categories because of the lack of local services and facilities within walking distance and the disjointed network of residential roads in cul-de-sacs and loops off through roads that cannot be improved.</li> <li>Residents note electric vehicle charging points are mentioned twice, and the commitment is heartening, though specific targets are necessary for the proposals to have credibility. They suggest that the numbers and energy-efficiency targets for a big retrofit programme are equally essential. Commitments to setting more tangible, quantitative proposals would be more convincing and for resident's keen to pursue their own electric vehicles. However, at the moment the lack of information about providing EV charging to existing properties with on-street parking is discouraging. They noted, in Enfield's Climate Emergency Action Plan the Council makes a commitment to "Influence residents to adopt zero carbon lifestyles and take low carbon decisions." Alongside the recognition of the important part that the Local Plan plays in helping the Borough respond to the climate emergency, they are disappointed to read how limited the Council's ambition to influence residents is. They indicate Prof Jules Pretty recently published a paper called "The Good Life and Low Carbon Living" which included this guide to personal behaviours to reduce annual carbon footprint, under the headings: food, home, mobility and leisure. It's a useful guide to what will make a difference and should inform policy priorities. Enfield cannot increase the size of its road network yet requires improved internal transport capacity for residents and commerce. It can enhance capacity by</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>improved junctions and underpasses (2 are justified across the A10) in the east. Making best use of road capacity by removing unproductive obstructions inserted in the name of cycling and LTN's, replacing with selective bus lanes to enhance the appeal of public transport is strongly supported, as is a policy of improving intersections.</p> <ul style="list-style-type: none"> <li>• Residents note that Enfield has major roads and served by rural scale intermediaries. Yet traffic manages to move the equivalent of half the population of Glasgow (600k pop) every day on such roads. There may be little scope for increased traffic at busy times yet the ELP envisages another 20% increase in population over the next 18 years. Peak congestion may increase but this is no reason to penalise all movement during the remainder of the day, nor to stigmatise reliance on personal transport, especially for the many with families, mobility issues, security concerns, and traders.</li> <li>• Residents note that the 80% mode share for active and sustainable travel is a London-wide target. In outer London, residents acknowledge that this is not possible. For example, the MTS states: Trips in this area [outer London] tend to be longer and have many different start and end points, which makes it harder to provide efficient public transport services.</li> <li>• Resident Group object to the continuing insistence on developments being 'car-free' when much of the transport in the borough remains sub-optimal (despite claims to the contrary by the Mayor of London).</li> </ul>
<p>Policy T2: Making active travel attractive and the natural choice</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Hertfordshire County Council fully support this policy, as it aligns with their principles outlined in LTP4. They fully support Enfield's aspiration to exceed minimum standards, which can often be insufficient to readily support uptake of cycling. HCC would also suggest a commitment may need to be given here to aiming to deliver to LTN 1/20 standard for cycling infrastructure, to avoid substandard facilities.</li> <li>• TfL broadly commend draft Policy DM T2 regarding Enfield Council's endorsement of the 'Healthy Streets Approach' and recognises it is in accordance with Policy GG3 and T2 of the London Plan.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• TfL broadly welcome the contents of this policy including the requirement for development to support the Healthy Streets Approach and improvements to walking and cycling access. However, they consider the reference to journeys under 2 km is misleading as there is great potential to increase active travel, particularly cycling, over longer distances.</li> <li>• TfL support the requirement in part 1c for development proposals to provide and ideally exceed minimum standards in respect of high quality short and long stay cycle parking provision on site or contribute to offsite provision where this is not feasible. TfL suggest that reference should be made here to the London Plan cycle parking standards being applied as a minimum requirement to be exceeded where possible and for the need to have regard to design guidance including the London Cycling Design Standards (LCDS) or any successor document. They would welcome the reference in part 1e to the creation of quieter neighbourhoods through the removal of road traffic and prioritising active travel measures over car journeys. The reduction or removal of car traffic could also be applied to selected locations in town or district centres.</li> <li>• The London Borough of Waltham Forest (LBWF) is highly supportive of the aims of the Movement and Connectivity Chapter and is delighted to see reference to the aim of achieving an 80% mode share towards sustainable travel including walking, cycling and public transport use by 204. They are also pleased to see reference to car free development in the period too which will help to progress the modal shift in the Local Plan period and beyond. LBWF believe that this partnership approach will improve east-west cross borough connectivity to existing and emerging assets. This has the potential to support existing and emerging communities, connect open spaces, accelerate the delivery of new homes, employment floor space, workspace and jobs, promote active travel and reduction of car use.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Countryside Properties is supportive of the healthy streets approach outlined in draft Policy T2, and the requirement for proposals to encourage the shift to active transport modes. Notwithstanding the important role proposed development can have in improving access to active transport modes, they recognise there needs to be greater recognition within draft Policy T2 that some locations are more suitable. It is critical that new development occurs in locations which are, or which can be, made sustainable including through enabling access for occupiers to a range of services by modes other</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>than the private car, and through facilitating use of public transport, walking and cycling as modes of travel.</p> <ul style="list-style-type: none"> <li>Landowners support general transport principles that have been outlined in Chapter 13 and agree with the draft approaches set out in T1 and T2. The Sustainability Movement and Connectivity place-making principles outlined in Draft Strategic Policy SP PL9 are consistent with the policies in Chapter 13.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Local residents would like to see both a stronger commitment to and a higher profile for active travel, and reducing car journeys, with targets set. There are targets about ‘whole life cycle carbon’ and a clear link to the climate plan, but a lack of metrics in the report as a whole. The phrase ‘low traffic neighbourhood’ does not appear in this section, or indeed anywhere else in the document. We would like to see a strong commitment to this in general, as well as in the design of any new developments. There’s only one proposal (on p45) for a new cycle lane.</li> <li>Policy T2 is to make active travel the natural choice yet we see almost no proposals for new active travel infrastructure or services. For instance, there’s only one proposal for a new cycle lane. Quieter neighbourhoods are also mentioned once, but as part of the (many) conditions to be met by developers. No suggestion that the council has an overall plan or will take any initiative.</li> <li>Residents agree with the policies set out on sustainable and active transport/travel, considering the mobility difficulties of what is likely to be an ageing population.</li> </ul>

**Table A.16:** Summary of main issues – Chapter 14: Environmental protection

Chapter or policy reference	Summary of main issues
Policy ENV1: Local environmental protection	<b>Specific Bodies (Statutory)</b>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Epping Forest District Council note there is further detailed technical analysis to take forward related to the HRA and EFSAC. However, it is unclear at this stage how or if traffic from Enfield will be mitigated by the strategy proposed by Epping Forest District Council, and it is likely that Enfield would need its own mitigation strategy in place. The proposed approach is something that requires further discussion between the neighbouring authorities and Natural England and is part of ongoing discussions under their Duty to Cooperate. Until the traffic modelling and air quality assessment has been completed, and mitigation agreed, it is not possible for EFDC to conclude no adverse effects on the integrity of the Epping Forest SAC as a result of air pollution.</li> <li>• The Environment Agency (EA) note policies should require developers to avoid potential dewatering activities being located in the most sensitive locations (i.e. SPZs) from a groundwater protection viewpoint. Policies should steer high risk developments away from SPZ1. This includes proposals that have the potential to release hazardous substances to ground, involve effluent discharge or will physically disturb an aquifer (E.g. Petrol filling stations in SPZ1).</li> <li>• The EA note in relation to Contaminated Land - It would be helpful if this section could link to and promote relevant guidance such the Environment Agency's Approach to Groundwater Protection and Land Contamination Risk Management (LCRM). The Approach to Groundwater Protection should be considered with regard to development proposals that we would object to in principle (E.g. petrol filling stations and non-inert landfills within SPZ1).</li> <li>• Natural England note the Local Plan indicates a housing delivery target of 25,000 homes by 2039. Whilst the contribution of this new development to air pollution impacts on the nearby designated sites is partially dependent on the chosen spatial development strategy, without effective cross-boundary cooperation with other Boroughs, it is unlikely that a Likely Significant Effect on the SAC can be ruled out.</li> <li>• Natural England agree with the conclusions of the HRA that currently the effects of the plan on air quality remain uncertain and that further information is required. We are pleased to see that the air pollution and traffic data surveys have been commissioned by Enfield Council and would be happy to discuss these once completed. In accordance with the paragraph 171 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.</p> <ul style="list-style-type: none"> <li>The Canals and Rivers Trust note that Pymmes Brook and Salmons Brook suffer from water pollution, which affects the water quality of the Lee Navigation. The source of pollution is generally considered to be misconnected plumbing, sewage overflows and pollutants from roads. Whilst we support section D of this policy, they suggest that more information on sources of water pollution should be provided.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Local MPs note the plan identifies principles relating to mitigation against poor air quality but there is little concrete within the plan or supporting documentation to secure this. Air quality improvements need to be secured while ensuring mitigation measures are not used by developers to reduce the provision of public realm and affordable housing within the site. The Colosseum retail park development consented in 2020 is an example of this with extremely poor public realm proposed and no provision to ensure air quality on the site was improved.</li> <li>Sport England supports the inclusions of the agent of change principle as this would protect sport sites, for example from new dwellings sited next to artificial grass pitches without sufficient mitigation against noise or on the edge of cricket sites without mitigation from ball strike. Sport England suggest that the latter example is considered to be mentioned in policy, potentially under hazard/health and safety section, as it is often overlooked by developers.</li> <li>The Conservators would wish to comment specifically on the need of the Borough to actively consider the provision of waste facilities, which they understand is being reviewed as part of the North London Waste Plan, though this is not referenced in this Plan version.</li> </ul> <p><b>Wider community</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Resident Groups note the lack of reference to the Edmonton Incinerator. Residents recommend a pause in the plans, and for proper consultation from the NLWA. There are disproportionate impacts from poor air quality.</li> <li>• Resident Groups note much greater clarity and restrictive wording is required.</li> <li>• Resident Groups note that there appears to be contradiction to the wider plan that proposes building on Green Belt land which absorbs carbon dioxide and causes lower levels of air pollution compared to areas that are built upon. Therefore, to achieve this policy they suggest the principle of the building on green belt land should be taken out of the plan.</li> </ul>

**Table A.17:** Summary of main issues – Chapter 15: Delivering and monitoring

Chapter or policy reference	Summary of main issues
Policy D1: Securing contributions to mitigate the impact of development	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Thames Water note Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5-year periods (AMPs).</li> <li>• Welwyn Hatfield District Council Draft recognise that the Infrastructure Delivery Plan provides a schedule of required infrastructure to support the preferred growth scenario and that further transport modelling and identification of mitigation measures will take place at the next stage of the plan. They support further modelling and consider that LB Enfield will need to engage with the relevant Hertfordshire planning and highway authorities under the Duty to Cooperate to understand the infrastructure implications arising from your proposals and to ensure they are appropriately mitigated.</li> <li>• TfL note to ensure consistency with London Plan in particular policy DF1 D where contributions towards public transport improvements should be given equal key priority status with affordable</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>housing. Public transport and active travel improvements are essential enablers of growth and will contribute to other identified priorities including tackling climate change and improving public health.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Landowners note that inappropriate and unjustified financial contribution policies seem to be finding their way in to the New Plan including, for instance, that “planning contributions will be sought towards the provision and maintenance of public art installations and cultural facilities from developments comprising 50 or more residential units. Whilst this is not to detract from the need to create interesting and cultural places to live and work, art is not necessary to make a development acceptable and this fails the CIL Regulation test for a planning obligation. The requirement for public art to make developments acceptable was taken out of national policy requirements many years ago. More importantly there remains a lack of evidenced based consideration of planning obligations. The majority of allocations across the New Plan remain extremely difficult to bring forward and are unlikely to accommodate contributions which are anything less than essential whilst producing viable development proposals. We have been unable to find a whole plan viability assessment and would strongly suggest that one is undertaken forthwith.</li> <li>• The Canals and Rivers Trust welcome the support in policy PL8 for improved walking and cycling routes along watercourses. We welcome any opportunities to work with the council to improve the towpaths of the River Lee Navigation for walking and cycling, improved connections, access points and wayfinding to strengthen the active travel and recreational network in Enfield. They suggest below that policy D1 of the Draft Plan should be amended to provide a stronger policy basis for the Council seeking financial contributions from new development to achieve this.</li> <li>• Landowners note Part 2 states that where an outline application is submitted, it should be accompanied by a full planning application for the first phase of the development. They do not consider this requirement to be appropriate and each case should be treated on its own merits, with pre-application advice being used as a tool to define the appropriate application format, in accordance with draft Policy DM DE2.</li> <li>• MPs note the policy highlights several critical transport infrastructure projects outside the Council's control - of [particular concern is the highways section (3.6) - many schemes underfunded or would</li> </ul>



Chapter or policy reference	Summary of main issues
	<p>make the situation worse by bringing greater volumes of traffic. At present, they consider that little information is provided to indicate how key priorities will be achieved.</p> <ul style="list-style-type: none"> <li>The City of London Conservators note that Strategic Policy SP D1: does not reference the securing of SAMM contributions by developments under 100 units to contribute to mitigation measures to protect the Epping Forest SAC under the Habitats Regulations 2017. The importance of cumulative mitigation being addressed through a combination of both SANGS and SAMMS needs to be considered. This combination is essential to ensure the effectiveness and certainty of avoiding adverse impacts from the Local Plan on EFSAC.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Resident groups note amenities are very much the props to quality of life in the suburbs. Health, education, employment services, sports and recreation plus freedom of movement - all are under pressure or not slated for upgrades anytime soon. They consider the freedom of movement is played down as inconvenient to the rapid growth that is core to the London Plan, which itself offers no major transport improvements to 2041. They consider there should be better management of existing services, rather than suppressed use or exclusion, is required to support quality of life for residents. On past form it's doubtful that will be delivered.</li> <li>Residents support the requirement for developments to make CIL contributions toward providing social infrastructure, often as well as needing financing, this infrastructure requires space. They can see Policy DM D2 allows a mechanism for this to be achieved on larger developments, there does not appear to be a way for this to be achieved from smaller schemes. This provision should be incorporated.</li> <li>Residents note there are no facilities within reasonable walking distance. Wider afield the picture is little better. Enfield's document, Cockfosters Ward Profile: 2021, paints a gloomy picture. In the entirety of the Cockfosters Ward, in which Hadley Wood sits, to serve a population approaching 15,000, there are two state primary schools, one state secondary school, and one library, three NHS doctor's surgeries and three NHS dentists. Other than one of the two state primary schools none are within walking distance of any current Hadley Wood resident and will, therefore, not be within walking distance for any of the hundreds of new residents which would be introduced to Hadley Wood if the</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>Green Belt land is released for development. The Hadley Wood primary school is already heavily over-subscribed.</p> <ul style="list-style-type: none"> <li>Residents note Para 15.1 refers to neighbourhood plans but the Plan does not appear to indicate how conflicts between the Local Plan and neighbourhood plans are dealt with. Strategic Policy SP D1, section 3. Infrastructure can be provided off-site where it is shown to be unviable on-site. This provision should be tightened, so that off-site becomes the rare exception. Para 15.4.1 states that the Plan will cover the 15-year period from 2024 to 2039. This wording is inconsistent with the remainder of the Plan, which indicates 20 years from 2019 to 2039.</li> </ul>
<p>Policy D2: Masterplans to achieve comprehensive development</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No specific comments</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Landowners note the policy sets out that proposals must be accompanied by a masterplan where they form all or part of a site allocation. They consider that this is in direct conflict to Strategic Policy SP SS2 which sets out that the Council will ensure that development is planned and implemented in a coordinated way in the identified placemaking areas, guided by Masterplans. Pending the preparation of and adoption of Masterplan SPDs for the identified placemaking areas and Borough-wide design guide, proposals for major development will be considered on the basis of good growth principles and policies included in this plan and the London Plan.</li> <li>Landowners and developers note that the requirement for proposals to be accompanied by a masterplan where they form part of a site allocation is an unnecessary and onerous policy requirement and, in many cases, will duplicate the planning application process. Policy D2 should therefore be deleted.</li> <li>The NHS welcomes the collaborative approach to infrastructure planning as set out in the policy and paragraph 15.3.1. Paragraph 15.3.2 refers to the Infrastructure Delivery Plan (IDP). The latest draft IDP (June 2021) identifies healthcare projects and priorities, including those new primary healthcare</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>facilities identified in the site allocations. The CCG would welcome the opportunity to update the latest IDP to ensure that it reflects current provision, the NHS strategic context and estate priorities.</p> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No specific comments.</li> </ul>
<p>Policy D3: Infrastructure and phasing</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Highways England is interested in the potential traffic impacts of any development site proposals and/or policies coming forward, and the need to ensure that these are fully assessed during the plan-making stage. It is also imperative to identify any improvements needed to deliver aspirations at this early stage, as set out in Government policy.</li> <li>• Highways England would expect necessary SRN improvements to have already been identified and tested as part of the cumulative assessment of the Plan. It should identify the provision of infrastructure at the right time to support the development strategy, combined with developer contributions to secure infrastructure provision as part of an Infrastructure Delivery Plan (IDP).</li> <li>• Hertfordshire County Council would like to ensure that sufficient infrastructure services are planned for within the borough of Enfield to provide for the medium growth option which has been selected of up to 25,000 homes. The Draft Infrastructure Delivery Plan is noted as a document to guide infrastructure provision, identifying the different types of infrastructure that will be required to meet future growth needs of Enfield, along with delivery and phasing, which will be further developed during the next stage of Local Plan production. As a service provider within Hertfordshire, the county council would be keen to engage in discussions regarding infrastructure projects particularly those close to the administrative border.</li> <li>• The London Borough of Redbridge supports the provision of the infrastructure identified in the draft Infrastructure Delivery Plan. They note the current uncertainties about Crossrail 2 and acknowledge that the plan makes appropriate reference to it and it is clear the borough would benefit. However, the plan correctly avoids placing undue emphasis on this proposal.</li> </ul>

Chapter or policy reference	Summary of main issues
	<p data-bbox="618 288 1133 316"><b>General bodies / other organisations</b></p> <ul data-bbox="667 347 2027 970" style="list-style-type: none"> <li data-bbox="667 347 1973 411">• The Department for Education request school projects listed in the draft IDP reflects the current position on planned education provision and would therefore request this document be amended.</li> <li data-bbox="667 443 2007 611">• The Metropolitan Police Service note that this document does not appear to show an understanding of the representations submitted on behalf MPS in 2019, the need for contributions towards policing infrastructure, or the established precedents for this. They suggest that it would be appropriate to update the document, to acknowledge that MPS has a key requirement for contributions towards policing infrastructure.</li> <li data-bbox="667 643 2027 810">• National Grid note the local distribution network operator is responsible for operating the local electricity distribution network which supplies electricity from the national electricity transmission system direct to sites and premises. If new infrastructure is required in response to an increase in demand across the local electricity distribution network the operator may request improvements to an existing National Grid substation or a new grid supply point.</li> <li data-bbox="667 842 1989 970">• Local MPs note the wider community Lack of infrastructure planning - the road network is already severely stretched, developing locations such as Crews Hill and Chase Park will cause more congestion and pollution. What provision has been made for schools, hospitals, doctors' surgeries/ clinics, nurseries etc.</li> </ul> <p data-bbox="618 1002 869 1029"><b>Wider community</b></p> <ul data-bbox="667 1061 2027 1364" style="list-style-type: none"> <li data-bbox="667 1061 2027 1364">• Residents note the increased population requires additional sports facilities. The mixed use and residential developments of Southbury and Enfield Town cannot come forward in a sustainable way- in a post pandemic environment- without quality active open space provision. A failure to invest in the Sports Village could delay the delivery of the sites in Southbury, in particular, and Enfield Town- with lower residential and commercial values the redevelopment of the retail and leisure parks becomes more challenging. The Sports Village is required to support and deliver growth across the Borough. Without an early intervention there is a significant risk that the existing pitches will be damaged to such an extent that the clubs using them become unsustainable being unable to retain and attract players. The Sports Village contributes to a wide range of Borough wide initiatives, for example</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>delivering equality across the Borough with good access from the deprived wards of the East and South.</p>
<p>Policy D4: Monitoring and reviewing</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Historic England note that the new London Plan Policy M1 (Monitoring) contains a new Key Performance Indicator relating to heritage. This is intended to monitor whether the applications that the GLA is consulted on have a beneficial, neutral or harmful impact on the historic environment – we would commend this approach to the Council in its monitoring framework.</li> <li>• The London borough of Waltham Forest is supportive of the ways in which the delivery of the Local Plan will be monitored.</li> <li>• The London borough of Redbridge support the inclusion of clear criteria for the review of the Local Plan, and the listing of remedial actions to be taken in the event of underdeliver. However, this policy should be considered a strategic policy.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The NHS suggest that objectives should consider net gain in community infrastructure. In addition, further indicators could be identified to monitor strategic objective No 2 and Policy SC1 using indicators in the Joint Health and Wellbeing Strategy related to the priorities of a healthy diet, increased physical activity, and providing more opportunities for social interaction.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Residents note the plan should say that “the policies and proposals set out in the Local Plan will be subject to review, in whole or in part, at least once every five years after its adoption”. They support this; however, it is unclear how and when the public might be involved in this review and further information on this would be welcome.</li> </ul>

**Table A.18:** Summary of issue by site

Chapter or policy reference	Summary of main issues
SA1: St Anne's Catholic High School for Girls	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency pointed towards generalised guidance around groundwater protection and potable groundwater abstractions that would need to be considered.</li> <li>• Historic England provided their support, but subject to specific reference to understanding, conserving and enhancing the significance of the historic environment, both to better reflect national planning policy but also to align more closely with strategic policies DE1 and DE4 elsewhere in the Plan. All relevant heritage assets should also be clearly identified on maps and diagrams.</li> <li>• Sport England noted that playing fields must be replaced to at least the same quality, quantity and accessibility as the existing site, and a similar approach should be taken to any indoor sports facilities that exist on site.</li> <li>• CPRE made similar comments (to be above point) in relation to playing fields.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The Trustees of the Sisters of the Holy Family of Nazareth-Good Shepherd Province – commented that there had been no direct contact with the Trust and that the land ownership was described incorrectly with the School standing on land owned by the Roman Catholic diocese of Westminster and the Trustees owning the field and convent property at 52 London Road.</li> <li>• A number of local groups objected to the proposals for housing on this site, noting the importance of the school to meeting the borough's social infrastructure needs.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• There was general objection from the community to redevelopment of this school site for housing. It was felt that the loss of the school was not justified, particularly without re-provision of an alternative</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>school facility in advance of this. It was also suggested that removal of a school playing field would require permission from the Secretary of State.</p> <ul style="list-style-type: none"> <li>• It was suggested that identification of the site was contrary to the London Plan Policy S3 which identifies a growing need for school places.</li> <li>• A number of residents suggested that demolishing the school would result in greater car use by local residents, as they would have to drive their children to schools which are further away instead.</li> </ul>
SA2: Palace Gardens Shopping Centre	<p>Objections were received from local residents and local politicians as well as support from statutory stakeholders. The most common issues being:</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Historic England – supported the policy in principle, but subject to specific reference to understanding, conserving and enhancing the significance of the historic environment, both to better reflect national planning policy but also to align more closely with strategic policies DE1 and DE4 elsewhere in the Plan. All relevant heritage assets should also be clearly identified on maps and diagrams.</li> <li>• NHS HUDU supported the delivery of enhanced health and community facilities in Enfield Town and in particular suggested that the redevelopment of Palace Gardens</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• A number of local residents’ groups and a councillor objected to the proposals for tall buildings here, with generalised comments on the negative impacts of tall buildings.</li> <li>• In particular, these groups noted the potential negative impacts of tall buildings on the setting of listed buildings and on the Conservation Area.</li> </ul> <p><b>Wider community</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Respondents mentioned that the site is in an inappropriate location for tall buildings. They considered that Enfield Town is a Conservation Area, so therefore tall buildings in this location would be out of keeping architecturally, dominate the skyline, and cast large shadows over locations such as Enfield Market Square, destroy the character, create congestion and overcrowding</li> <li>• Respondents consider that tall buildings will spoil the character of Enfield Town and the area will end up looking like Edmonton Green. They suggest that the character needs to be preserved as well as providing more restaurants etc.</li> <li>• Respondents considered that development will comprise of high priced apartments aimed at the rental market of singles and couples, rather than sensibly priced ownership for families</li> <li>• Respondents expressed their concerns over the lack of car parking provision. They consider that the flat owners (of the new development) will continue to drive and own cars – which will have a substantially adverse impact on all surrounding roads for extensive periods of time.</li> <li>• Respondents consider that tall buildings are ugly and take up a lot of daylight from the surrounding area.</li> </ul>
SA3: 100 Church Street	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Dominvs Group recognises that the Council has to bring forward both brownfield development sites and greenfield sites in order to achieve mixed and balanced communities. However, in their view they consider it is invariable that brownfield land has a greater role to play in the short-term in order to ensure that the Council can demonstrate a five-year supply of housing land and boost overall housing delivery. In supply terms, identified Green Belt sites which are proposed as draft allocations in the emerging Local Plan will have a greater lead-in time owing to the fact that they are unable to be consented prior to the adoption of the Local Plan without demonstrating that Very Special Circumstances exist. There is an urgent need to ensure that committed and allocated brownfield sites</li> </ul>



Chapter or policy reference	Summary of main issues
	<p>in the Council's trajectory are maximised in terms of development capacity to contribute to addressing the urgent need to increase housing supply in the short-term.</p> <ul style="list-style-type: none"> <li>• Respondents recognised that the lack of housing delivery is now having a direct impact on the affordability of housing for local people and cannot continue. They consider that the Council require sites such as SA3 to be fully optimised if this trend is going to be reversed.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community consider the units proposed are too small.</li> <li>• Respondents object to the site allocation because of the lack of parking for residents.</li> </ul>
SA4: Enfield Town station and the former Enfield Arms	<p>Comments have been received from statutory bodies, local organisations and the wider community relating to this site allocation.</p> <p>Representations from the Environment Agency set out the policies that would need to be applied to this site allocations.</p> <p>Overall, there is broad support for this site allocation with some considerations to be made relating to the wider place making vision set out in policy PL1 that the site allocation is located within. On the other hand, objections have been received relating to the height of development at this location.</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency provides the following information in regard to groundwater protection relates to the following sites. Sites within SPZ1 are particularly sensitive with respect to groundwater, and additional constraints will be placed on the above development proposals. With respect to the Environment Agency's Approach to Groundwater Protection, the following chapters would apply to these sites: <ul style="list-style-type: none"> <li>○ D1-General principles-all storage facilities</li> </ul> </li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>○ D2-Underground Storage (and associated pipework)</li> <li>○ D3-Subwater table storage</li> <li>○ G2- Sewage Effluent Discharges within SPZ1</li> <li>○ G4- Trade effluent and other discharges within SPZ1</li> <li>○ G8-Sewage pipework</li> <li>○ G13- Sustainable Drainage systems</li> <li>○ N7- Hydrogeological risk assessment</li> <li>○ N8-Physical disturbance of aquifers in SPZ1</li> </ul> <ul style="list-style-type: none"> <li>● The EA would recommend planning conditions for any piled foundation proposals at these sites. The use of piled foundations would require a robust supporting Foundation Works Risk Assessment demonstrating that they are appropriate at the particular location and would not result in a deterioration of groundwater quality. Without such a risk assessment we would object to the use of piled foundations at these sites.</li> <li>● The EA notes for sites in close proximity to potable groundwater abstractions they would strongly advise that the abstraction licence holder is also consulted with respect to piled foundation proposals.</li> <li>● Historic England support the place making vision but have observations for Enfield Town as set out in Policy PL1 in which this site allocation is located. There are concerns strategic policy PL1 underplays the potential effects of envisaged development will have on the historic environment, existing local character and significance of individual heritage assets across the place making area.</li> <li>● Historic England recommend placemaking visions and strategic policies for each place should include specific reference to understanding, conserving and enhancing the significance of the historic environment, both to better reflect national planning policy and align more closely with strategic policies DE1 and DE4 within the Local Plan.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Relevant heritage assets should be clearly identified on maps and diagrams.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• TfL Commercial Development welcome the inclusion of this draft site allocation. In accordance with Enfield's SA4, TfL CD consider the allocation to be suitable for high density, mixed-use development, including residential, offices, retail and commercial, and cultural facilities. They also consider there to be an opportunity to enhance Enfield Town Station's transport facilities. They would welcome the proposed timeframe of 5 to 10 years.</li> <li>• Regenta Development supports the inclusion of SA4 in principle but suggest that modifications to text is made by removing: 'vacant public house' from existing land use text; clarify what is meant by 'usual methodology for assigning indicative site density will not apply'; land use requirements should recognise that phased development through different applications would be supported; change availability to 0-5 years.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Respondents object to the inclusion of SA4 and consider that a 17 Storey development in Enfield Town Station and 13 storey buildings in Palace Gardens and Southgate Circus would be totally out of sympathy with the surrounding architecture.</li> <li>• Respondents consider that Enfield Town and Southgate still retain a village feel and a building of this height would tower over the surrounding area, adversely effecting local housing and businesses, impacting on residents' quality of life and putting an increased strain on local infrastructure.</li> </ul>
SA5: Enfield Civic Centre	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• The Twentieth Century Society notes the inclusion of the site ‘SA5: Enfield Civic Centre’ in the draft local plan and is concerned that it is described as one of a ‘number of key development sites’ in the borough. The Society considers the Enfield Civic Centre to be of local heritage significance and believe it should be treated as a non-designated heritage asset (NDHA). The civic centre was built in 1957-75 by Eric Broughton &amp; Associates. Its architectural and historic interest is indicated by its inclusion in contemporary and recent architectural texts. Significantly, it is recorded in Pevsner’s London: North volume of the Buildings of England series. This notes the ‘Dominant twelve-storey tower at N end of the site, clad in stainless steel, of 1972-5 by Eric G. Broughton &amp; Assocs [...] The first phase, 1957-61 by the same firm, is a satisfying composition, consisting of a long brick administration range with upper floor projecting over a blue brick base, and the Council Chamber to the rear reached by a bridge from the main stairs. In front, a pool created from a loop of the New River; bronze sculpture of the Enfield Beast by R. Bentley Claughton. Inside, in the stairwell, an applique wall panel by Gerald Holtom’. The Twentieth Century Society urges the local authority not to earmark the Enfield Civic Centre as a potential development site.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Respondents objected to the proposals for tall buildings on this site, particularly noting that this would be unsympathetic to the surrounding area. They noted alongside Palace Gardens and the Enfield Town Overground station that the inclusion of the site would lead to a large number of taller buildings in the area.</li> <li>• Respondents consider that the proposals for tall buildings were also noted as unacceptable in the context of the Grenfell disaster.</li> </ul>
SA6: Tesco, Southbury Road	<p>Comments have been received from statutory bodies, local organisations and the wider community relating to this site allocation.</p> <p>Representations from the Environment Agency set out the policies that would need to be applied to this site allocations.</p> <p>Overall there is broad support for this site allocation with some considerations to be made relating to the wider place making vision set out in draft policy PL1 that the site allocation is located within. On the other</p>

Chapter or policy reference	Summary of main issues
	<p>hand, objections have been received relating to the height of development at this location, to the cumulative loss of retail of this site allocation in conjunction of others and lack of certainty over future provision on site when development schemes come forward.</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency notes for sites in close proximity to potable groundwater abstractions they would strongly advise that the abstraction licence holder is also consulted with respect to piled foundation proposals.</li> <li>• Historic England support the place making vision with observations for Enfield Town set out in Policy PL1 in which this site allocation is located. There are concerns strategic policy PL1 underplays the potential effects of envisaged development will have on the historic environment, existing local character and significance of individual heritage assets across the place making area.</li> <li>• Historic England recommend placemaking visions and strategic policies for each place should include specific reference to understanding, conserving and enhancing the significance of the historic environment, both to better reflect national planning policy and align more closely with strategic policies DE1 and DE4 within the Local Plan.</li> <li>• Historic England mentioned that relevant heritage assets should be clearly identified on maps and diagrams.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Bush Hill Park Residents Association objects to the inclusion of sites: SA6, SA8, SA10, SA12, SA19, SA20, SA22, SA32 (Existing Food Retail). They note, that when combined, the quantum of homes totals 3,247 (not including Tesco/Ikea Glover Drive). They consider that whilst the trend to online food retail has accelerated through the pandemic, to convert all these sites to housing/ mixed use, and through the reduction in car parking, is sub optimal. The substantial amount of housing proposed for these sites suggests a likely large reduction in car parking space. The residents' association object to the implementation of these policies areas if they will reduce car parking for food retail.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Enfield Town Residents Association object to the land being described as brownfield and raise issues related to how residents travel to retail destinations, noting surveys conducted by retailers themselves reveal that around 60% of shoppers arrive at retail destinations in the borough by car, in contrast to the less than 30% typically cited by LBE from surveys conducted with interviewers.</li> <li>• Respondents recognise a major concern if the site allocation is implemented. They consider that proposals are likely to lead to the loss of many of our major food retailers from the borough, followed by a decline in the small businesses that surround them and an increase in delivery vehicles on the road network.</li> <li>• Regenta Development request the site allocation should include 29 Southbury Road for residential led development.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Respondents object to these sites being targeted for mixed use as it will necessarily result in a significant loss of car parking for food retail.</li> <li>• Respondents raise concerns that the site allocation lacks certainties. They question whether car parking will remain on the site and what is the impact of any change?</li> <li>• Respondents raise concerns that the site allocation lack of certainties. They question what size retail units will remain? Will they be adequate in size to serve local community? What will the impact be on jobs?</li> <li>• There was a comment that housing is not needed here.</li> </ul>
SA7: Oak House, 43 Baker Street	Comments have been received from Historic England, where they express a general support for the Place Making vision this site allocation sits within but with greater consideration given to the impact development will have on the historic environment, existing local character and the significance of individual heritage assets across the place making area.

Chapter or policy reference	Summary of main issues
	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Historic England support the place making vision with observations for Enfield Town set out in Policy PL1 in which this site allocation is located. There are concerns the strategic policies PL1 underplays the potential effects of envisaged development will have on the historic environment, existing local character and significance of individual heritage assets across the place making area.</li> <li>• Historic England recommend placemaking visions and strategic policies for each place should include specific reference to understanding, conserving and enhancing the significance of the historic environment, both to better reflect national planning policy and align more closely with strategic policies DE1 and DE4 within the Local Plan.</li> <li>• Historic England consider that relevant heritage assets should be clearly identified on maps and diagrams.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul>
SA8: Sainsburys, Crown Road	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency advised that the site been identified as partly or fully overlying historic landfills: Development on historic landfills may require an Environmental Permit. They advise that developers need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Sainsbury's Supermarkets Ltd highlighted the essential grocery offer of the site, and the potential for the store to provide an anchor role in redevelopment. They argue in favour of the retention of the</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>store, highlighting negative consequences if the store is lost. They argue that redevelopment should incorporate the re-provision of adequate car parking to support the viability of the re-provided store.</p> <ul style="list-style-type: none"> <li>Bush Hill Park Residents Association and Enfield Town Residents Association highlight concerns with the redevelopment of the site for residential/ mixed use, and potential loss of car parking.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Representations raised the issue of the loss of car parking, and uncertainties over future retail provision on site.</li> </ul>
SA9: Colosseum Retail Park	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The Environment Agency identified the site as a historic landfill and noted the potential need for an environmental permit.</li> <li>NHS HUDU noted they had already provided comments on the hybrid planning application at this site and supported the need for health infrastructure across the wider area to be looked at holistically. They also noted that the site was one where there was potential for health uses, subject to evidence of need.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>No comments were received.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Few comments were received in relation to the site specifically, but the existing retail park was noted as being disconnected from the wider community.</li> </ul>
SA10: Morrisons, Southbury	<p><b>Specific Bodies (Statutory)</b></p>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• No comments received</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The landowner of site SA10 - support the inclusion of the site as a proposed site allocation. They suggested that the estimated capacity in the plan could be increased, and this was supported by initial feasibility and capacity testing work.</li> <li>• Local groups highlighted the number of supermarket sites that had been proposed as site allocations, and objected to the loss of these amenities, particularly if they would result in reduction of car parking associated with the food stores.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• There was mixed feedback in relation to the site.</li> <li>• Some residents objected to what was seen as the targeted loss of valuable supermarket uses and associated car parking.</li> <li>• Some residents noted that individual sites proposed in the plan, such as the Morrisons, made sense from a development perspective as they were in areas not surrounded by existing properties.</li> </ul>
SA11: Southbury Leisure Centre	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments received</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The landowner of the site indicated their support for inclusion of the site as a proposed site allocation. The landowner suggested that the estimated capacity in the plan could be increased, and this assertion was supported by initial feasibility and capacity testing work that was previously submitted alongside the original call for sites submission.</li> </ul>

Chapter or policy reference	Summary of main issues
	<p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Limited comments were received in relation to the site allocation.</li> <li>Feedback indicated that the affordable leisure facilities were needed and should not be lost. However, it should be noted that the proposed site allocation does not include the existing leisure centre.</li> </ul>
SA12: Tesco, Ponders End, 228 High Street	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comments were received</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>A number of residents' associations highlighted the number of supermarket sites that had been proposed as site allocations, and objected to the loss of these amenities, particularly if they would result in reduction of car parking associated with the food stores.</li> <li>No other representations were received, including from the landowner.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Comments from residents were similar to those from residents' associations, objecting to loss of supermarket facilities, and concern over whether food retail stores and adequate associated car parking would remain on site.</li> </ul>
SA13: Edmonton Green Shopping Centre	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>TfL highlighted the need for any development proposals and changes to traffic circulation to safeguard the continued operation of the bus station. They also suggested that the proposed amount of car parking should be substantially reduced in line with London Plan policy T6.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• NHS HUDU supported the policy to revitalise the town centre and noted they had responded to the planning application for the shopping centre site.</li> <li>• Sport England objected to the inclusion of the allocation as it seemed to advocate the loss of the leisure centre without it being replaced, which would be contrary to the NPPF and Sport England policy.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The landowner was supportive of the inclusion of the site allocation but noted that the estimated capacity should be increased. They also noted they thought the required land uses were too vague and suggested greater specificity would be beneficial to help understand the Council's vision for the site, but that this should take into consideration the finely balanced viability of mixed-use redevelopment.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul>
SA14: Chiswick Road Estate (Oswald and Newdales)	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul>

Chapter or policy reference	Summary of main issues
SA15: Joyce Avenue and Snells Park Estate	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comments received.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Encaf objects to the inclusion of the site allocation as the homes are already in the pipeline but designated in a 10 year window. The Council Minutes acknowledge that the scheme would be expensive but it would create over 2,000 new affordable homes.</li> <li>NHS London HUDU welcomes the policy which seeks to revitalise the high street and renewal of the neighbouring housing estates. The CCG is working with the Council to assess the healthcare needs and infrastructure requirements arising from the emerging proposals for the Joyce Avenue and Snells Park Estate (SA15). The area also contains a site in the south-east corner of the North Middlesex University Hospital (SA18) and the CCG supports the redevelopment of this site for housing as part of the Trust's wider masterplan for the hospital site.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comments received.</li> </ul>
SA16: Public House, 50-56 Fore Street, London	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comments received.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Social Housing Plus – Fore Street Limited welcome the inclusion of the site as a site allocation within the draft Local Plan. This recognises the important contribution the Site can play in meeting the Council's overall objectives for the new Local Plan. They have indicated the Site had capacity to accommodate circa 120 residential dwellings together with commercial floorspace. Therefore, the current estimated site capacity of 68 homes as set out within the draft Local Plan significantly underestimates the Site's capacity. They note that the site allocation also deals with heritage</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>considerations, which gives a draft heritage consideration of 'amber'. They would suggest the 'amber' allocation is removed and instead the draft allocation recognises the Site is located adjacent to the Fore Street Conservation Area and designated and non-designated heritage assets. It considers the location is of low sensitivity but with proposals needing to consider the setting of the conservation area and heritage assets.</p> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul>
SA17: Upton and Raynham	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul>
SA18: South-east corner of the North Middlesex University Hospital Trust, Sterling Way, London	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No comments received.</li> </ul>

Chapter or policy reference	Summary of main issues
<p>SA19: IKEA store, Tesco Extra, 1 Glover Drive, Meridian Water, Willoughby Lane and Meridian Way</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The EA provides the following information in regard to groundwater protection relates to the following sites. Sites within SPZ1 are particularly sensitive with respect to groundwater, and additional constraints will be placed on the above development proposals. With respect to the Environment Agency's Approach to Groundwater Protection, the following chapters would apply to these sites: <ul style="list-style-type: none"> <li>○ D1-General principles-all storage facilities</li> <li>○ D2-Underground Storage (and associated pipework)</li> <li>○ D3-Subwater table storage</li> <li>○ G2- Sewage Effluent Discharges within SPZ1</li> <li>○ G4- Trade effluent and other discharges within SPZ1</li> <li>○ G8-Sewage pipework</li> <li>○ G13- Sustainable Drainage systems</li> <li>○ N7- Hydrogeological risk assessment</li> <li>○ N8-Physical disturbance of aquifers in SPZ1</li> </ul> </li> <li>• The EA would recommend planning conditions for any piled foundation proposals at these sites. The use of piled foundations would require a robust supporting Foundation Works Risk Assessment demonstrating that they are appropriate at the particular location and would not result in a deterioration of groundwater quality. Without such a risk assessment we would object to the use of piled foundations at these sites.</li> </ul> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Bush Hill Park Residents Association notes that the inclusion of sites: SA6, SA8, SA10, SA12, SA19, SA20, SA22, SA32 (Existing Food Retail) when combined totals 3,247 homes (not including Tesco/Ikea Glover Drive). They acknowledge that whilst the trend to online food retail has accelerated through the pandemic, to convert all these sites to housing/ mixed use, and with the reduction in car parking, is sub optimal. The substantial amount of housing proposed for these sites suggests a likely large reduction in car parking space. The residents' association object to the implementation of these policies areas if they will reduce car parking for food retail.</li> <li>• Ikea Properties Investment support the inclusion of the allocation but considers that it fails to recognise IKEA's current role in the area and importance in meeting retail/ employment needs. They wish to explore how the current store can be accommodated into the wider placemaking vision, without adversely affecting future business plans.</li> <li>• Enfield Town Residents Association object to this allocation as they are valuable areas that support retail in the borough. To imply anything less is quite simply nothing other than dishonest.</li> <li>• The NHS London HUDU notes that the aspiration is for the whole Meridian Water placemaking area to deliver 10,000 homes, but only 5,000 new homes is set out within the plan period on SA19. It supports the policy which recognises that significant social infrastructure is needed to respond to housing and population growth and help create a new local centre. The CCG is working with the Council to secure appropriate healthcare infrastructure as part of the Phase 1 and 2 planning applications. It suggests that this site could include a proposed health use subject to evidence of need.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community considers that the council should seek to build 10,000 new homes at Meridian Water during the plan period, which would avoid the need for release of the Green Belt</li> <li>• Residents object to these sites being targeted for mixed use as it will necessarily result in a significant loss of car parking for food retail.</li> <li>• Residents object to Policy PL5: Meridian Water because the land on the “east bank” needs to put forward for mixed-use development as part of this plan, with any loss of SIL off-set by intensification</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>within the site area itself and/or by the creation of new SIL areas e.g. in Southbury. They consider that if this does not happen, the main new park and greenspace planned for the area (i.e. at Edmonton Marshes), will be cut-off from the new homes i.e. the homes for Phases 1 and 2 will be on one side of an industrial estate and the greenspace on the other. They recognise that the council has repeatedly told local residents that 10,000 homes will be delivered at Meridian Water, but this draft Local Plan would deliver just half of this and offers no guarantee whatsoever that 10,000 homes would ever be built at the site.</p>
<p>SA20: Asda Southgate, 130 Chase Side, Southgate</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Historic England noted these areas each contain a concentration of designated heritage assets as well as successful existing character that will clearly be affected by the level of development proposed, including a number of tall buildings. While they note the relevant documents in the evidence base relating to tall buildings, there does not appear to have been any assessment of local sensitivity to such development and therefore the effects of heights proposed on heritage significance. The Plan should be much clearer as to these potential effects and how they will be managed, rather than leaving this to the point of decision on individual planning applications when they will be more difficult to avoid. Using an assessment of significance to determine appropriate heights is key.</li> <li>• The NHS noted the site could include a proposed health use subject to evidence.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• No specific comments</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Residents noted whilst the trend to online food retail has accelerated through the pandemic, to convert all these sites to housing/ mixed use, with the attendant reduction in car parking, is sub optimal. The substantial amount of housing proposed for these sites suggests a likely large reduction in car parking space.</li> </ul>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>Residents object to the implementation of these policies areas if they will reduce car parking for food retail.</li> </ul>
SA21: Southgate Office Village, 286 Chase Road	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>Historic England note that each area contains a concentration of designated heritage assets as well as successful existing character that will clearly be affected by the level of development proposed, including a number of tall buildings. While they note the relevant documents in the evidence base relating to tall buildings, there does not appear to have been any assessment of local sensitivity to such development and therefore the effects of heights proposed on heritage significance. The Plan should be much clearer as to these potential effects and how they will be managed, rather than leaving this to the point of decision on individual planning applications when they will be more difficult to avoid. Using an assessment of significance to determine appropriate heights is key.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>No specific comments</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No specific comments</li> </ul>
SA22: M&S Food, Southgate	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>Historic England note that each area contains a concentration of designated heritage assets as well as successful existing character that will clearly be affected by the level of development proposed, including a number of tall buildings. While they note the relevant documents in the evidence base relating to tall buildings, there does not appear to have been any assessment of local sensitivity to such development and therefore the effects of heights proposed on heritage significance. The Plan should be much clearer as to these potential effects and how they will be managed, rather than</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>leaving this to the point of decision on individual planning applications when they will be more difficult to avoid. Using an assessment of significance to determine appropriate heights is key.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• No specific comments.</li> </ul> <p><b>Wider community</b></p> <p>Residents noted whilst the trend to online food retail has accelerated through the pandemic, to convert all these sites to housing/ mixed use, with the attendant reduction in car parking, is sub optimal. The substantial amount of housing proposed for these sites suggests a likely large reduction in car parking space. They object to the implementation of these policies areas if they will reduce car parking for food retail.</p>
<p>SA23: Minchenden Car Park and Alan Pullinger Centre, 1 John Bradshaw Road, Southgate</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Historic England note that each area contains a concentration of designated heritage assets as well as successful existing character that will clearly be affected by the level of development proposed, including a number of tall buildings. They note the relevant documents in the evidence base relating to tall buildings, there does not appear to have been any assessment of local sensitivity to such development and therefore the effects of heights proposed on heritage significance. The Plan should be much clearer as to these potential effects and how they will be managed, rather than leaving this to the point of decision on individual planning applications when they will be more difficult to avoid. Using an assessment of significance to determine appropriate heights is key.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Barnet and Southgate College – is keen to ensure its development plans are consistent with and complementary to those for the neighbouring Site Allocation SA23 (Alan Pullinger Centre and Minchenden car park). They would be very interested collaborating with the other landowners to deliver a joint redevelopment of this part of the High Street.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>Landowners support the inclusion of this draft Site Allocation SA23 which allocates the site for comprehensive mixed-use redevelopment. They support proposals for the Southgate placemaking area, which includes the site. They seek to confirm the level and mix of development in the site allocation, especially as there is more than one site involved. They note that draft Site Allocation SA23 states the combined site area is 0.11ha. However, their understanding that the site area of the Alan Pullinger Centre is 0.1101 hectares and the site area for the Minchenden Car Park is 0.2471 hectares; totalling 0.3572ha. Based on the above they suggest that the site could be further optimised to deliver additional dwellings. They consider that development of the site for housing / non-residential uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1). The site is previously developed land, with a high PTAL. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Residents note the car park listed as Minchenden Car Park in Leigh Hunt Drive is used by both shoppers and commuters. Its use has been promoted by residents in feedback to the Southgate regeneration consultation, in order to encourage shoppers to park here rather than in the town centre. This car park is key to removing cars from the town centre and driving through the area. Building on this car park will make it more difficult to achieve the aim of removing cars from Southgate. The Alan Pullinger Centre is the only youth provision in the immediate Southgate area. It is used by a wide range of groups and has been instrumental in helping youths who may potentially exhibit anti-social behaviour. Removing this facility would be detrimental to the lives of many local young people. Rather than removing this completely, they consider it could be redeveloped to provide better provision for youth groups and other local community groups.</li> </ul>
SA24: Arnos Grove Station car park	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>Historic England note that the inclusion of SA24 is within the setting of the Grade II* listed Arnos Grove tube station. While they would not disagree, there is potential for development on either site,</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>they also note that tall buildings are also indicated for this area. They would point out that the list description for Arnos Grove station specifically identifies its landmark status in the locale as part of the reason for its special interest. Again, they consider that an understanding of the significance of the station itself is necessary to help determine what appropriate building heights should be in this area.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Landowners welcome the inclusion of New Southgate as an identified placemaking area and a major urban foci of high quality growth as identified by Policy SP SS1 Part 4.</li> <li>• Landowners support the Council’s objective to deliver a mix of social affordable rented homes and intermediate homes across the borough with flexibility for individual sites subject to site specific considerations including viability and/ or where higher amounts of affordable housing are proposed.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Residents submitted strong objections to the proposal to build on the Arnos Grove car park. It restricts access to public transport and will significantly disadvantage, indeed bar very many of our disabled, elderly and frail residents from using the station.</li> </ul>
SA25: Site between North Circular Road and Station Road	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency note the former Gasworks sites i.e. SA25 is associated with a former gasworks site, a highly contaminative former use. These sites will require detailed intrusive investigation to characterise any soil and groundwater contamination on site, and any development scheme will be required to fully establish the risks to controlled waters. Groundwater is sensitive at this location as the sites lie atop a Secondary A Superficial aquifer (River Terrace Deposits).</li> </ul> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Landowners welcome the allocation of the former Homebase site, Gasholder site and Topps Tiles site for redevelopment to create new homes. The policy acknowledges that the wider Western Gateway site is the only opportunity for large scale development in the area.</li> <li>• Landowners note the draft plan fails to allocate the Builders' Depot site for development. This is at odds with the discussions that have taken place with LBE to date. This failure to allocate the Builders' Depot site for development also contradicts with the draft plan, which states that the developers of the Western Gateway sites "must bring forward development in a coordinated manner in order to ensure that the potential of the sites here can be maximised". The exclusion of the Builders' Depot site will undoubtedly undermine the delivery of LBE's aspiration for a coordinated approach to the development of the Western Gateway.</li> <li>• The NHS note that New Southgate area contains the inclusion of two site allocations SA25 and SA26 where new housing is planned. They support the policy which identifies the need for improvements to community facilities and the CCG would welcome the opportunity to review the requirements in the light of the new site allocations and the demand generated by the Ladderswood estate development.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No specific comments.</li> </ul>
SA26: Station Road, New Southgate	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency note the former Gasworks sites i.e. SA26 is associated with a former gasworks site, a highly contaminative former use. These sites will require detailed intrusive investigation to characterise any soil and groundwater contamination on site, and any development scheme will be required to fully establish the risks to controlled waters. Groundwater is sensitive at this location as the sites lie atop a Secondary A Superficial aquifer (River Terrace Deposits).</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The NHS note that New Southgate area contains the inclusion of two site allocations SA25 and SA26 where new housing is planned. They support the policy which identifies the need for improvements to</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>community facilities and the CCG would welcome the opportunity to review the requirements in the light of the new site allocations and the demand generated by the Ladderswood estate development.</p> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No specific comments.</li> </ul>
SA27: Land at Crews Hill	<p>Objections were received from local residents, statutory consultees, neighbouring authorities and local interest groups, as well as some support from developers. The most common issues they highlighted are set out below:</p> <p><b>Specific bodies (statutory)</b></p> <ul style="list-style-type: none"> <li>• Welwyn Hatfield District Council has serious concerns on the level of harm that will result to the Green Belt as a consequence of this allocation.</li> <li>• Hertfordshire County Council support the inclusion of the draft site allocation and would like to be involved in the stakeholder masterplanning, particularly whether there is any school provision to be utilised within Hertfordshire by developments in Enfield.</li> <li>• Hertfordshire County Council indicated they would be unable to accommodate significant influx to the county.</li> <li>• Historic England noted that there should be explicit reference to the historic environment</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Developers, landowners and site promoters welcomed the inclusion of Crews Hill in the plan and indicated that these benefits serve to highlight why Crews Hill can help meet the challenges and objectives that face Enfield over the plan period and beyond.</li> <li>• Developers indicated that Crews Hill has the potential to create a new sustainable residential community to meet the anticipated housing need over the plan period and is ideally suited to make significant contributions to these emerging housing targets to support housing delivery in Enfield and</li> </ul>

Chapter or policy reference	Summary of main issues
	<p data-bbox="712 284 1995 352">London as a whole. It was suggested that the benefits could be secured through the allocation and any future masterplanning exercise.</p> <ul data-bbox="667 379 2033 1337" style="list-style-type: none"> <li data-bbox="667 379 2033 619">• Developers, landowners and site promoters supported the Council’s approach to remove the area identified within the Crews Hill Concept Plan Map from the Green Belt. It was highlighted that following the Examination in Public process of the London Plan and the Main Modifications put forward, the tests for demonstrating Exceptional Circumstances contained within the adopted new London Plan now reflect those contained within the NPPF. It was suggested that the approach set out in the draft ELP to establishing Exceptions Circumstances is in conformity with the London and national policy requirements;</li> <li data-bbox="667 646 2033 847">• Developers noted that the ELP is supported by a Green Belt review that was prepared independently by LUC. They noted its importance, but also highlights that it is not – and should not – be the sole driving factor as to whether a parcel should be released from Green Belt, which is a planning judgement that has to be made around preferred site options by the Council, including in cognisance of the national policy at NPPF Paragraph 142 which directs where Local Planning Authorities should consider releasing Green Belt when it is deemed to be necessary.</li> <li data-bbox="667 874 2033 975">• Developers highlighted that the evidence should assess the finer grained nature of the contribution of parcels to Green Belt purposes, and the potential for Green Belt mitigation, in considering the finite extent of the Crews Hill allocation area.</li> <li data-bbox="667 1002 2033 1070">• Developers considered that Crews Hill is a sustainable location, part of which includes previously developed land which is centred on an underutilised train station.</li> <li data-bbox="667 1098 2033 1230">• Developers and site promoters suggested that the existing transport infrastructure (i.e. Crews Hill station) is not being utilised to its full potential. Due to the nature of the garden centres and the large goods they trade, the area is currently heavily dominated by car use which overshadows the existence of the train station.</li> <li data-bbox="667 1257 2033 1337">• Local residents’ groups suggested that there is currently insufficient transport infrastructure to support the proposals.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Local residents' group suggested that a key benefit put forward was the opportunity to deliver new social and community infrastructure – to serve both the new settlement and northern part of the Borough – as part of a planned new community; rather than needing to plan for piecemeal upgrades to existing provision. Its community infrastructure could be self-contained and self-funding, with the settlement able to deliver new local day to day facilities.</li> <li>• Local residents' group suggested that the delivery of a new settlement can incorporate climate resilience measures, significantly benefitting from a community-wide approach (rather than a focus just on buildings) as well as incorporating development-wide measures, such as on-site renewable energy generation, to achieve net zero carbon targets in line with draft Strategic Policy SP SE1.</li> <li>• Developers, site promoters and landowners indicated that delivery could also provide employment, skills and training opportunities both during construction and operation through the delivery of flexible business spaces, live-work opportunities and community infrastructure. This would more than off-set any loss in economic activity from the loss/displacement of the existing uses, creating significant net economic and employment benefits.</li> <li>• Developers considered that given the substantial scale of the inclusion of the draft Site Allocation (approx. 82 hectares) the policy wording should be amended to state 'a minimum of 3,000 homes' rather than approximately 3,000 homes.</li> <li>• Similarly, developers suggested that the policy should be clearer on how many homes are proposed to be delivered overall - with evidence for this – clearly stating how many homes would be delivered within the plan period and how many are anticipated beyond the plan period. It was requested that further information and elaboration be provided in relation to the safeguarding of land for future plans, as mentioned in the draft plan.</li> <li>• A number of developers also highlighted concerns about the indicative area for housing development shown in the draft plan and suggested that this should be revised or removed.</li> <li>• One housebuilder suggested that development should be phased from the west, where less land coordination would be required, meaning development could come forward at a faster pace.</li> </ul>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Developers noted that Crews Hill has the ability to deliver a large number and wider range of new homes and can therefore act as a counterbalance to the denser forms of development associated with the intensification of LB Enfield's urban land. It was noted that in recent years development in LB Enfield has weighed predominantly in favour of flatted and smaller homes.</li> <li>• However, developers highlighted that they thought there were areas of further work required in relation to the placemaking area which needed to be addressed in the next draft. They noted that the placemaking policy should be informed by iterative masterplan led process which should be supported by fully worked up IDP and site-specific viability evidence. This could help establish the scale of land required to be released to enable the new settlement to incorporate necessary infrastructure (including social and community facilities) and achieve a critical mass with a housing mix and form of development appropriate to its setting and location.</li> <li>• Developers noted that how the 'core area' should be defined may require refinement and the precise extent of Green Belt boundaries changes needed to be established, with particular reference to how changes to Green Belt boundary might dovetail with maintaining and enhancing the remaining Green Belt in the future, including mitigation/enhancement measures (such as new woodland and tree planting to the west of Crews Hill to respect and respond to views across the valley from The Ridgeway).</li> <li>• Site promoters queried the need to retain existing equestrian uses on site and suggested that any potential replacement of equestrian and horticultural uses and garden centres could be clustered away from the station to an area which is more suitable for car access as customers will still require cars to transport plants and large good (e.g., garden furniture and equipment). The site and Crews Hill would provide a feasible option to locate new residential or residential-led mixed use development in a shorter timeframe (approx. 6-10 years).</li> <li>• Subject to viability, developers indicated that Crews Hill could contribute much needed affordable and private family dwellings, which would accord with the priorities set out in Draft Policies SP H1 and SP H2 within the Draft ELP.</li> <li>• LBE Property Services support the allocation of the site at Crews Hill Golf Course as part of one of the new ten placemaking areas and consider the site can make a significant contribution towards</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>achieving the Council’s vision and strategic objectives. However, Crews Hill Golf Club highlighted that the golf course has a 30-year lease on their land, with no break clause, and therefore questioned the availability of the land within the plan period. They also suggested that Crews Hill Golf Course should be upgraded to a Metropolitan level SINC and preserved for its ecological value;</p> <ul style="list-style-type: none"> <li>• Northaw &amp; Cuffley Parish Council objected to the proposed inclusion of the allocation PL9 for 3,000 dwellings and associated infrastructure. They indicated that the approach set out in the plan is legally flawed for reasons (1) reasonable less environmental damaging options have not been tested; (2) the basis for the release of high value Green Belt land does not meet the legal test for exceptional circumstances according to CPRE study which considered the availability of non-Green Belt land and the availability of at least the Brimsdown SIL site; and (3) the allocation is dependent on a transport strategy and assumptions about line capacity that are not tested. They consider that the allocation is not justified and therefore fails the soundness test mandated by the NPPF 2021 para 35.</li> <li>• Some local residents’ groups asserted that SIL should be de-designated instead of Green Belt release, highlighting the placemaking area is not a sustainable location, and is likely to be car dependent. It was also suggested that the findings of the ‘Space to Build’ survey submitted by Enfield Road Watch previously had not been adequately considered. It was also suggested that development in this part of the Green Belt would diminish the separation between settlements.</li> <li>• Residents’ groups also noted that the large number of garden centres in Crews Hill are a sub-regional attraction, and their loss will be a great loss to local economy and would lead to loss of local jobs;</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community objected to the loss of golf course, losing access to the countryside, loss of recreation and sport, and the site being in an outstanding area of SINC importance</li> <li>• The wider community consider that the land is Green Belt and meets all the Green Belt purposes and indicated that there are enough brownfield sites in Enfield to accommodate development needs, therefore there is no need to build on this site.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Objections received from MPs and local councillors to building on the green belt and other green spaces. They indicated that there would be impact on environment and there is a need to retain as much green and open space as possible.</li> <li>• MPs and the wider community recognise that the PTAL in Crews Hill is very low, so residents would use their cars to travel – which is contrary with other policy objectives of reducing congestion and air pollution, and encouraging healthy lifestyles.</li> <li>• A number of residents used a proforma response which emphasised the historic importance of Enfield Chase in the development of Enfield, highlighting the landscape value of the remaining undeveloped parts of the Chase. The proforma response also highlighted the value of Crews Hill businesses in terms of employment, and as a resource for residents of the borough and further afield. It argued that horticultural activities should be encouraged and enhanced to support food and plant production.</li> </ul>
SA28: Land at Chase Park	<p>Objections were received from local residents, statutory consultees, neighbouring authorities and local interest groups, as well as some support from developers. The most common issues they highlighted are set out below:</p> <p><b>Specific bodies (statutory)</b></p> <ul style="list-style-type: none"> <li>• Historic England is unclear whether any analysis of the heritage assets and their settings have played a part in determining whether the site is appropriate for such large-scale development given the potential effects on their significance, or whether such analysis has been taken into account in determining the indicative capacity.</li> <li>• The Environment agency suggested that the site is a vital upland soakaway to prevent downstream flooding</li> <li>• TfL disputed that the area was well served by public transport, noting that a 30-minute walk to a tube station is not considered to provide good access. It was noted that when measured on WebCat PTAL most of the proposed development area is 1a to 1b.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• NHS HUDU noted that housing development in Crews Hill and Chase Park will require investment in new infrastructure to support the growth. At Chase Park, this could include a health facility as envisaged in clause 10 of the policy based on evidence of need. The area is close to Chase Farm Hospital and the indicative site boundary includes land to the north of the hospital site. As such development in the area should be planned in a coordinated taking account future phases of development on the Chase Farm site.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Local groups noted that the release of Green Belt land in this location is concerning, particularly as the evidence suggested this could cause a high/very high level of harm.</li> <li>• National interest group recognised that the area is rich in biodiversity, contributes to carbon capture, and helps negate some of the harmful effects of Climate Chaos, including, clean air to breathe and safe surface water management. Situated in the protected Green Belt it affords Enfield residents with immediate access to nature and the countryside, providing “openness” with unhindered historic rural views. Many respondents noted the value of Merryhills Way which is a much-valued Public Right of Way which crosses the site, noting that development here would decrease its value. It was also noted that it was considered there was already a deficit of green space per person in the ward. They also noted the potential impact on biodiversity and loss of habitats (the site was noted as being of ornithological importance).</li> <li>• National interest group also suggested that the land contributes to the setting of the adjacent Trent Park Registered Park and Garden and that the heritage significance of the site should play a role in informing the placemaking of the area, with some respondents noting that development here would cause irrevocable harm to the coherence of the historic Enfield Chase.</li> <li>• MPs and local interest groups raised concern that proposals were too focused on the proximity of the railway stations doing little to address the poor local transport connections which would result in the majority of journeys made by private vehicles. The lack of clarity regarding the major infrastructure improvements needed to deliver development of this scale causes concern that this deficiency is not being given sufficient weight, even at this early stage.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Local interest groups were concerned that Chase Park is in an area of poor transport access (PTAL 1a and 1b), with poor road access and limited public services. They stated this meant the location could not be considered sustainable, and as the area is too hilly cycling would not be a realistic alternative to public transport. It was suggested residents living in any development here would have to travel to other town centres to access services and facilities, which would further exacerbate impacts on roads.</li> <li>• On the contrary, support was received from developers, landowners and site promoters indicating that the site performs weakly against the purposes of the Green Belt set out by the NPPF.</li> <li>• Site promoters indicated that a clear case for Exceptional Circumstances for release of the site can be established by virtue of the poor-quality Green Belt land and the significant range of benefits redevelopment can deliver</li> <li>• Developers indicated that the site is in a highly sustainable location – within walking distance of Oakwood Station on the Piccadilly Line and the bus stop outside the site is served by two bus routes with a frequency of 12 buses per hour. The site is within walking distance of a range of services and facilities, including Oakwood local centre and key infrastructure such as schools and open spaces.</li> <li>• Site promoter suggested that the land South of Enfield Road can be delivered within five years of permission being granted and can take advantage of existing infrastructure already in place and further enhance this by providing a new school, open space and green and blue infrastructure (including the rewilding of specific areas of the site which provide linkages to wider areas of open space).</li> <li>• Site promoters suggested a scheme here could deliver a range of different type of units to meet need within the borough, including a significant majority of family dwellings which is the biggest source of need in the borough (unlike flatted development to the East of the Borough) and older person care and accommodation.</li> <li>• Local groups were sceptical that the homes that would be delivered would be affordable, citing the nearby Trent Park development as an example.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Developer noted that the amount of developer contributions should not be prescribed, noting that the assumptions used in the whole plan viability assessment had been referenced within the placemaking study for Chase Park.</li> <li>• Local groups suggested there was inadequate infrastructure to support the proposed growth and pointed to Comer Homes – the most significant landowner of the area – already publicly promoting the site for 5,000 homes – i.e., in excess of the 3,000 homes stated in the draft Local Plan.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• A number of residents used a proforma response which emphasised the historic importance of Enfield Chase in the development of Enfield, highlighting the landscape value of the remaining undeveloped parts of the Chase. The proforma response also highlighted the value of the Merryhills Footpath to recreation and health, and argued that the farmland should be put to productive use growing local food for local people.</li> <li>• The wider community considered that the site is in the Green Belt, meets all of the Green Belt purposes and therefore should not be considered for development.</li> <li>• Residents and local interest groups strongly dispute analysis which indicates this site does not meet Green Belt purposes. Furthermore, residents and local interest groups indicate that there are enough brownfield sites in Enfield to accommodate development needs.</li> <li>• The wider community considered that the proposed development would cause high or very high harm to open Green Belt countryside.</li> <li>• Residents and local interest groups were raised concerns that the development would cause irreversible harm to the coherence and integrity of Enfield Chase Heritage Area, severing the link between Trent Park and Old Park and adversely affecting the setting of both; it would end the visual separation between Oakwood and Enfield Town provided by the experience of passing through open countryside on the A110; it would spoil the openness of the popular Merryhills Way.</li> </ul>

Chapter or policy reference	Summary of main issues
<p>SA29: Arnold House, 66 Ridgeway</p>	<p><b>Specific bodies (statutory)</b></p> <ul style="list-style-type: none"> <li>Historic England was unclear whether any analysis of the heritage assets and their settings have played a part in determining whether the site is appropriate for such large-scale development given the potential effects on their significance, or whether such analysis has been taken into account in determining the indicative capacity. As such it considers there is a risk that the approach set out in section 3 (Places) and the constituent site allocations undermines the strategic approach set out elsewhere in the Plan to the historic environment.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Nicholas Holdings wants further consideration given to the release of a larger area of land for housing to the west and north of the proposed Housing Allocation SA29 (SHLAA/HELAA site HIC8. They suggest the site could provide additional opportunity for delivering housing early on in the Plan period, and would play a more sustainable and more connected development at Chase Park through to Gordon Hill. The Key Diagram currently shows a clear unconnected divide between the development at Chase Park and the existing urban area to the northeast, and further consideration should be given as to how connections could be improved between the planned new neighbourhood and Gordon Hill.</li> <li>Geras Estates Limited and Hebe Developments Limited request that site allocation be amended for 'care home/ extra care units.' Site 2: support the release of the site from the green belt. Site has the capacity for 62 units.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comments received.</li> </ul>
<p>SA30: Claverings, Centre Way, London N9 0AH</p>	<p><b>Specific bodies (statutory)</b></p> <ul style="list-style-type: none"> <li>No responses were received from specific bodies.</li> </ul> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• LBE Strategic Property Services expressed support for the proposed site allocation. Clarity was sought on the quantum on non-residential floorspace proposed.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No responses were received.</li> </ul>
SA31: Cockfosters station car park (parcels a + b), Cockfosters Road	<p>Comments have been received from statutory bodies, politicians, local organisations and the wider community related to this site allocation.</p> <p>A number of points have been raised in objection to this site allocation relating to a number of policies relating to delivering well-designed, high quality and resilient environment (SP DE1), securing contributions to mitigate the impact of development (SP D1), strategic and local views (DM DE5), promoting sustainable transport (SP T1), making active travel attractive and the natural choice (DM T2) and tall building (DM DE6). There is support for the site allocation which will support sustainable transport methods for residents (SP T1).</p> <p><b>Specific Bodies (Statutory).</b></p> <ul style="list-style-type: none"> <li>• The EA notes for sites in close proximity to potable groundwater abstractions they would strongly advise that the abstraction licence holder is also consulted with respect to piled foundation proposals.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Cllr Alessandro Georgiou raised objections in relation to this site allocation: <ol style="list-style-type: none"> <li>1. Development would blight the landscape, going well beyond the height of the existing Black Horse Tower. (Policy H1)</li> <li>2. All education and health services are already stretched in Cockfosters with no possible chance of expansion of the primary schools, secondary school or local GP practice. (Policy D1)</li> <li>3. Cockfosters Station is a Grade II listed building with great architectural significance. (Policy DE10)</li> </ol> </li> </ul>



Chapter or policy reference	Summary of main issues
	<ol style="list-style-type: none"> <li>4. The site sits within the Conservation Area which alone should stop a scheme from proceeding. (Policy DE10)</li> <li>5. The Council has recognised that the views from certain sites within the Greenbelt are valued. All sites that would be negatively impacted if this proposal were to proceed. (Policy DE5)</li> <li>6. This would spell the end of much need parking for families, the disabled, the elderly, commuters and local shoppers. The existing 370 spaces are well used and much valued by the Cockfosters community. (Policy T1 &amp; T2)</li> <li>7. By TfL's own admission over 690 cars are parked per day within the car park. Statistically even if 12 Blue Badge spaces were retained this would not be anywhere near enough to cover need at Cockfosters station car park. This doesn't even begin to account for others that may not be Blue Badge holders, such as pregnant women, who will be clearly adversely impacted if they cannot find a necessary parking space. (Policy T1 &amp; T2)</li> <li>8. Where will all these new residents park their cars? Cockfosters residential roads can just about accommodate existing residents and those from outside the area. These proposals rather than reducing car usage will simply displace cars throughout the area inevitably leading to CPZs. (Policy T1 &amp; T2)</li> <li>9. The imposition of up to 15 storey tower blocks overlooking the final resting place for many (Cockfosters Cemetery) would clearly have an emotionally harming impact on their loved ones. (Policy DE6)</li> </ol> <ul style="list-style-type: none"> <li>• Connected Living London (CLL) strongly supports the inclusion of the Site adjacent to Cockfosters Station as an identified allocated housing site within Policy H1 (2). The Cockfosters Station site (Ref: SA31) is suitable and available now for housing delivery and can be delivered within the first 5 years of the plan period. The Site therefore meets the definition of 'Deliverable' housing sites as set out in Annex 2 of the NPPF (2021).</li> <li>• CLL consider that the inclusion of SA31 supports the strategic vision and requirement for sustainable growth and meets the tests of soundness.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• CLL support the principle that the draft ELP focuses growth in placemaking areas, town centres and at transport nodes as identified by SP SS1 Part 3. Promoting development around transport nodes supports the principle of sustainable development and encourages residents to adopt a shift away from reliance upon cars by having easy access to other modes of transport whilst optimising previously developed land. This focus is therefore in conformity with the London Plan. However, it is considered that this could be further strengthened to ensure that the borough optimises land, especially previously developed or 'brownfield' land set out at NPPF paragraph 119. Paragraph 120 (d) also highlights the importance of promoting and supporting the development of underutilised land including car parks and railway infrastructure. This is further supported by Policy GG2 of the London Plan (Part A). Residential development should be provided in sustainable locations near to tube stations or involving the redevelopment of car parks (London Plan Policy H1).</li> <li>• CLL support the need for developments to accord with the local area's vision, however it is recommended that an interim requirement is included within the Policy. This would ensure that development proposals in placemaking areas without an adopted 'placemaking vision', or larger developments in locations outside of placemaking areas, can be prepared and implemented without delay which includes SA31.</li> <li>• TfL Commercial Development welcome the inclusion of draft allocation SA31 Cockfosters Station Car Park (Parcels a and b) Cockfosters Road. The site is subject to live planning application ref.21/02517/FUL. TfL CD strongly support the inclusion of the Cockfosters Station Car Park, as a Draft Allocation in the Draft Enfield Local Plan. The Site provides a key opportunity for the borough to deliver much needed housing on a brownfield site at a sustainable location with high transport accessibility.</li> <li>• TfL CD recommend that the plan recognises the capacity of the site to accommodate at least 351 residential units, as demonstrated by the planning application. No evidence has been provided to justify that 316 units, as suggested by the draft allocation.</li> <li>• Chase New Homes Ltd objects to the inclusion to SA31. The New Plan represents a complete policy U-turn from adopted policy which has not been justified at all through the evidence base. It is noted in particular that the area around Cockfosters Station, having previously been identified as an inappropriate location for tall buildings, is now classified as appropriate and is allocated for very high-</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>density housing within the New Plan. The TfL application is on a site which is part of designated 'Local Open Space', within the setting of:</p> <ol style="list-style-type: none"> <li>1. a Grade 2 listed building (the station),</li> <li>2. Trent Park Grade II Registered Park and Garden, and</li> <li>3. immediately abutting the Metropolitan Green Belt and</li> <li>4. on a prominent ridge.</li> </ol> <ul style="list-style-type: none"> <li>• Chase New Homes considers it is a completely inappropriate site for such a severely dense scheme, as already stated within the Council's existing evidence base in the Report on the Location of Tall Buildings and Important Local Views 2012, and the Council's existing adopted policies. The New Plan appears to be a poor attempt to shoe-horn in policy support for an extremely poor site.</li> <li>• Chase New Homes consider the approach to be inconsistent to protecting heritage assets and townscape &amp; the proposed allocations can only achieve the numbers quoted with very high-density schemes – tower blocks/tall buildings</li> <li>• Cockfosters Residents Association raised objections to the site in relations to its sensitive location being it is adjacent to the Green Belt. It is within a Conservation Area and it is adjacent to a Grade II nationally listed building (Cockfosters Station), a locally listed building (Trent Boys School House) and a nationally Grade II Listed Park &amp; Garden (Trent Park).</li> <li>• CRA provided comments that relate to modifications to text relating to SA31 and Policy H1. The PTAL of 6a is incorrect. The correct figure is mainly 3 with part being 4. Heritage Considerations should read: 'Within the Trent Park Conservation Area; within the immediate setting of Cockfosters Station (Grade II Listed Building) and Trent Park Registered Park and Garden. Within the wider setting of numerous other heritage assets. Green – heritage constraints; potential to develop; usual methodology for assigning indicative density may not apply; heritage impact assessment required; mitigation required.'</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Enfield Town Residents Association object to SA31 on the same basis as representations made on Arnos Grove site allocation.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community object to the inclusion of SA31 in the plan. They consider the removal of the car park would negatively impact the mobility and engagement with local businesses and would therefore be bad for the economy.</li> <li>• The wider community objected the principle of height proposed for tall buildings in Cockfosters (15 storeys). They raised an objection in relation to impact on the Grade 2 listed tube station. (Policies DE6: Tall buildings and DE4: Putting heritage at the centre of place making)</li> <li>• The wider community object to the inclusion of the Cockfosters station car park as an appropriate location for tall buildings in Figure 7.4 because this would conflict with draft SP 6.4.2 (Relating to policy DE6: Tall buildings)</li> <li>• The wider community consider that the proposals for Cockfosters/Arnos Grove are ill-thought both in terms of quality of design and density of development, and lack of creative thinking around creating a joined-up transport network in the area. (Relating to policy DE1: Delivering a well-designed, high quality and resilient environment).</li> <li>• The wider community raised concerns relating to the loss of parking at train and tube stations as proposed in SA24 (Arnos Grove) and SA31 (Cockfosters). They believe that parking at stations is essential to encourage people who do not live near public transport to use trains and the tube. A lack of parking will force people to drive to their destinations.</li> </ul>
SA32: Sainsburys, Green Lanes	<p>Objections were received from local residents and local politicians, as well as some support from the wider community. The most common issues are set out below.</p> <p><b>Specific bodies (statutory)</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• The Environment Agency highlighted relevant guidance in relation to groundwater protection that would need to be considered in assessing development proposals.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Organisations raised concerns in relation to the loss of the supermarket and the cumulative impact of the proposed allocation of a large number of supermarkets in the borough and concern residents would have nowhere else to shop</li> <li>• Organisations raised concerns surrounding the loss of open space with respondents pointing out that the Secretary of State allowed planning permission in 1986 for Sainsburys to be built on the condition that the green space was retained for community use, whilst others noted there was a covenant on the land to retain 40% of the site as public green space.</li> <li>• Organisations felt that there was not enough certainty over whether the shopping facility would be re-provided on site, and if it was to be, whether an adequate level of car parking would also be provided.</li> <li>• Organisations considered that the inclusion of SA32 in the plan would have an impact on biodiversity.</li> <li>• Organisations were concerned that the potential closure of the store would lead to the loss of jobs and have an impact on the local economy</li> <li>• Organisations raised the potential impact on equalities particularly in relation to elderly and disabled residents – with respondents noting this would force them to have to travel further for accessible shopping facilities with adequate car parking.</li> <li>• Organisations highlighted that the likely additional pressure on local infrastructure such as GPs practices, schools, public transport, open space etc. was also noted as a concern.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• In general residents' concerns were similar to those of general bodies/organisations which included residents' associations, local interest groups and local politicians.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Some respondents supported the inclusion of the proposals set out in SA32, if the supermarket remained in situ.</li> <li>• Several residents recognised the need for new homes in areas with good links to public transport, roads and amenities and supported the allocation – particularly because the site is a brownfield site, so there is no need to go into the Green Belt.</li> <li>• However, there was a suggestion that the site was not big enough to accommodate 299 homes and 13,325 sqm of floorspace and provision of public green space and be in keeping with the character of the local area.</li> <li>• Residents suggested that the park surrounding the store should be retained and designated as an asset of community value</li> <li>• Residents noted that the potential loss of the open space, impact on biodiversity and loss of trees, including those with TPOs was raised as a concern.</li> <li>• Residents also raised concern about the impact of development on the existing road network as well as associated air quality impacts, particularly on nearby schools.</li> <li>• Residents also commented on the lack of community facilities available in the immediate environs of the site.</li> <li>• Several residents argued that larger affordable housing units are needed, which the site would not be capable of delivering.</li> <li>• Several respondents commented on design and townscape matters, arguing that the site is inappropriate for development because of the proximity of historic properties, and a negative impact on the skyline as well as daylight/sunlight impacts on neighbouring properties.</li> <li>• Respondents raised queries relating to the future of Winchmore Hill library adjacent to the site.</li> </ul>

Chapter or policy reference	Summary of main issues
SA33: Blackhorse Tower, Holbrook House and Churchwood House, and 116 Cockfosters Road	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comments noted related to this site allocation.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Cockfosters Local Area Residents Association, notes that Appendix 1 which classifies Holbrook House/ Blackhorse Tower, the building next door, as 'Inappropriate location; inappropriate building'. No explanation or justification is given for this total reversal the council's view of appropriateness.</li> <li>Chase New Homes Ltd, indicates that the Plan is not based upon a proper planning assessment of the character of the Borough and the evidence base, the report then confirms that tall buildings are inappropriate due to the local setting, and only buildings in Cockfosters smaller than the existing Blackhorse Tower (our client's building) may be considered appropriate.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Residents expressed their concerns around the plans to redevelop the area around Cockfosters station and they consider the area as inappropriate for tall buildings.</li> </ul>
SA34: 241 Green Street	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>Historic England raised an objection and considers that a number of site allocation policies will conflict with overarching aims to conserve and enhance the historic environment. Without adequate consideration and identification of potential heritage issues at the plan-making stage, there is also the possibility that such site allocation policies will not provide for conservation and enhancement of the historic environment (NPPF para 20), not be based on up to date and relevant evidence (para 31) and may contain unacceptable ambiguity (para 16b).</li> <li>Historic England strongly suggest undertaking a significance-based approach to site allocations, as set out in our guidance on this subject: The Historic Environment and Site Allocations in Local Plans (<a href="http://historicengland.org.uk">historicengland.org.uk</a>). This comment applies to all site allocations bar SA30, 34, 35 and 40</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>although please see our comments on the Places section of the Plan and further comments on certain site allocations below.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Stonegate Homes Enfield Limited suggest that a request that the allocation is revised to reflect the recent consent (20/01526/FUL) - capacity for 148 homes.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comment.</li> </ul>
SA35: Land at former Wessex Hall Building	<p>Comments have been received from a statutory body and a national organisation relating to this site allocation.</p> <p>Concerns have been raised over the inclusion of this site allocation which is deemed to conflict with overarching aims to conserve and enhance the historic environment and conflict with the NPPF.</p> <p>Objections received on the inclusion of proposed site allocation as it involves the release of Green Belt for development.</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>Historic England considered a number of site allocation policies will conflict with overarching aims to conserve and enhance the historic environment. Without adequate consideration and identification of potential heritage issues at the plan-making stage, there is also the possibility that such site allocation policies will not provide for conservation and enhancement of the historic environment (NPPF para 20), not be based on up to date and relevant evidence (para 31) and may contain unacceptable ambiguity (para 16b).</li> <li>Historic England strongly suggest undertaking a significance-based approach to site allocations, as set out in our guidance on this subject: The Historic Environment and Site Allocations in Local Plans (<a href="http://historicengland.org.uk">historicengland.org.uk</a>). This comment applies to all site allocations bar SA30, 34, 35 and 40</li> </ul>



Chapter or policy reference	Summary of main issues
	<p>although please see our comments on the Places section of the Plan and further comments on certain site allocations below.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• CPRE London object to the inclusion of SA35 because the site is within the Green Belt so the allocation for housing is inappropriate. They consider there is enough brownfield land available to meet development needs in Enfield. They recognise that the site forms part of a green-chain and development on this site would narrow this stretch of the chain. Given it is not needed for development, CPRE London consider the site could be enhanced to provide nature value.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No comments noted related to this site allocation.</li> </ul>
SA36: 188-200 Bowes Road	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• No comment.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Notting Hill Genesis notes that the site at 173-189 Green Lanes is located within a large local centre and sits adjacent to land being identified as transformative level in Figure 7.1. It is therefore suggested that allowing the site to be increased to a transformative level of change would be in compliance with the characteristics of well-designed places as set out in the draft policy. The site at 1-7 Bowes Road and 141-161 Green Lanes is also located within a large local centre and provides the opportunity to optimise site capacity given its location beside the A406 North Circular Road. It is therefore considered appropriate that the level of change for this site should be increased to transformative. The site at Ritz Parade, 140-186 Bowes Road sits within a large local centre and the site which lies adjacent currently has planning permission (Site Allocation SA36). It would therefore seem logical and appropriate for both SA36 and the site allocation for Ritz Parade (Site Allocation SA38) to form a transformative level of change area within the Local Plan.</li> </ul>

Chapter or policy reference	Summary of main issues
	<p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No specific comment.</li> </ul>
SA27: Main Avenue site	<p>Comments have been received from local organisations and the wider community, with similar concerns relating to the scale of development that would be acceptable on this site allocation in relation to the existing character of the area.</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No statutory representations received relating to this site allocation.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Bush Hill Residents Association object to the inclusion of the site. They consider that the Local Plan does not give any specifics about the type of housing that could be provided, but as a Residents' Association we fear that densification will be used. They object to any additional height being added to the site as this would be out-of-character for the otherwise mostly late Victorian area.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>The wider community consider that Local Plan does not give any specifics about the type of housing that could be provided.</li> <li>Respondent objects to any additional height being added to the site as this would be out-of-character for the otherwise mostly late Victorian area.</li> </ul>
SA38: Land at Ritz Parade	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comments were received on this policy from specific consultees.</li> </ul> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>Notting Hill Genesis argue that the site should be earmarked for 'transformational' change. Recommend that the site can accommodate a minimum of 105 units, rather than the 79 included in the draft site allocation.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>One representation suggests an S106 contribution is secured to fund the installation of floodlights for Broomfield School's Astro pitch to allow hockey to be played.</li> </ul>
SA39: Travis Perkins Palmers Green, Bridge Drive, Broomfield Lane	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The Environment Agency indicated the site is within a 250m radius of a potable groundwater abstraction. They strongly advise that the abstraction licence holder is consulted with respect to piled foundation proposals. They advised that the use of piled foundations would require a robust supporting Foundation Works Risk Assessment demonstrating that they are appropriate at the particular location and would not result in a deterioration of groundwater quality. Without such a risk assessment they would object to the use of piled foundations at these sites.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>W M Morrison Supermarkets Ltd.'s submission referenced this site, but they did not comment any material aspect of the site allocation.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comments were received.</li> </ul>
SA40: Land at Brimsdown Sports Ground	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The EA has identified the site as partly or fully overlying historic landfills: Development on historic landfills may require an Environmental Permit. They consider developers for these sites would need</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.</p> <ul style="list-style-type: none"> <li>• Historic England suggests undertaking a significance-based approach to site allocations, as set out in our guidance on this subject: The Historic Environment and Site Allocations in Local Plans (historicengland.org.uk)</li> <li>• Sport England objects to the site allocation as it suggests that there could potentially be the loss of playing field land and associated facilities. The PPS clearly states that this site should be protected as playing field in the Local Plan.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• CPRE London does not support the site for housing and it should be removed from the Site Allocations. In particular because (1) it is Metropolitan Open Land and no justification is given for removing the designation (2) enabling development is not an appropriate justification for developing on MOL and, in any event, CIL funds will be available from other nearby developments to restore the grounds. Given new homes planned in the immediate neighbourhood, as well as the potential for 7,500 homes to be built nearby in Brimsdown, at an absolute minimum this site should be safeguarded to ensure green space needs can be met now and in future. It should be brought back into use using funding from nearby major developments. Any consideration of use of this site should refer to MOL status, green space standards (i.e. referencing the amount of green space available per head of population) including needs as set out in the Playing Pitch Strategy.</li> <li>• United Living New Homes notes that the site is designated as a Local Open Space in the existing and emerging Local Plans, it is fenced off from public access and is in a dangerous, derelict and unsightly condition. The land contains multiple fly tipping sites, areas of severely overgrown vegetation, dangerous structures and – having previously been used for industrial landfill – is heavily contaminated. The site poses a serious risk to public safety and is a liability to the Council as freeholder.</li> </ul> <p><b>Wider community</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>The wider community recognise that the site is widely used by both the private football club and local sports teams and question what is proposed to accommodate them.</li> </ul>
SA41: Albany Leisure Centre and car park and 55 Albany Road	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>None received</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>LBE property services support the inclusion of the draft Site Allocation SA41 which allocates the site for approximately 30 extra care homes and community floorspace at ground floor level with retention/renewal of the existing leisure centre. It also seeks conformation whether the surface level car park to the northern end of the site is included within the allocation. A holistic approach for the site is required so it would be useful to review the site to ensure future development is being optimised.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Residents object to the inclusion of SA41 and consider that the site has as a great leisure facility and has fantastic provision, for learning to swim and club facilities with good provision drawing people from across the borough and beyond. They consider that new building should not be at the expense of pre-existing leisure centre and should remain to encourage residents to stay healthy.</li> </ul>
SA42: Fords Grove car park	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The Environment Agency notes the following information in regard to groundwater protection relates to the following sites. They recommend planning conditions for any piled foundation proposals at these sites. The use of piled foundations would require a robust supporting Foundation Works Risk Assessment demonstrating that they are appropriate at the particular location and would not result in a deterioration of groundwater quality. Without such a risk assessment they would object to the use of piled foundations at these sites.</li> </ul> <p><b>General bodies / other organisations</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Winchmore Hill Residents Association is supportive with the policy of development of smaller brown field sites within the borough, they note a concerned about the inclusion of the three sites in Winchmore Hill as potential areas for development: <ul style="list-style-type: none"> <li>- SA32 Sainsburys Green Lanes (on which there is a covenant to retain 40% of the site as public green space).</li> <li>- SA42 Fords Grove car park. Traders have already lost a significant amount of on street parking, through the construction of the A105 cycle lanes. The New River development will generate an additional parking requirement, as will the former Travis Perkins site to be redeveloped shortly. Any development will result in over-population, no supporting infrastructure and even more congested roads.</li> <li>- Firs Farm Recreation Ground (p380) has been designated as a site for a crematorium, with no recognition in the Local Plan of its ecological and community significance; especially as there are plans to build a community hub on this location.</li> </ul> </li> <li>• Southgate District Civic Voice noted that the draft plan includes a proposal to build 24 houses on the car park. SDCV considers that a desirable use of this space would be as an open space and children's play area, which the area lacks. Suggesting if residential development were to be planned for this site it would need to be part of an overall approach to planning of the local environment. One need is as we have said for open space and a play area. Another major need for the area is a traffic management scheme to address the following problems: <ul style="list-style-type: none"> <li>- on street parking on both sides of Fords Grove by workers and commuters avoiding paying to park in the Fords Grove car park and taking possible spaces for Fords Grove residents' vehicles</li> <li>- the resulting traffic congestion, particularly during the morning and evening journeys to and from work and school</li> <li>- the pollution that the traffic produces, not just from exhaust fumes, but also dust and particles from tyres and brake linings which deposit films of dust inside the houses in Fords Grove.</li> </ul> </li> </ul>

Chapter or policy reference	Summary of main issues
	<p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Residents raised concerns indicating that Fords Grove and Farm Road are narrow streets and subject to quite a lot of traffic, this will greatly increase Congestion on the local roads and put severe pressure on parking. There are currently issues with street parking to visit the Winchmore Hill high street has been removed due to the new and successful cycle lane, and the Fords Grove car park is the only public parking available to the High Street. Furthermore, housing/flats will overpopulate the area, given the recent and future developments along Green Lanes - Travis Perkins, Capitol House etc. Additionally, there is a lack of supporting infrastructure- doctors, dentists, schools etc.</li> </ul>
SA43: Lodge Drive car park (incl. depot), Palmers Green	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The Environment Agency notes the following information in regard to groundwater protection relates to the following sites. They recommend planning conditions for any piled foundation proposals at these sites. The use of piled foundations would require a robust supporting Foundation Works Risk Assessment demonstrating that they are appropriate at the particular location and would not result in a deterioration of groundwater quality. Without such a risk assessment they would object to the use of piled foundations at these sites.</li> <li>LBE Strategic Property Services suggests that the Council ensures that the development potential of the site is optimised. The site is proposed to be reconfigured to retain a car park and allow the delivery of residential development. Development of the site for residential uses would help support the Council's Vision and Strategic Objectives (draft Local Plan Chapter 2) and contribute towards achieving the housing target (draft Policy H1). The site is previously developed land and in close proximity to a range of transport modes. Development would achieve sustainable patterns of development (in accordance with NPPF Para. 11). The site is deliverable (in accordance with the NPPF). It is available for development (in the plan period) and any relevant legal matters are currently being reviewed. Development is achievable and the location is suitable for development.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>No comments.</li> </ul>

Chapter or policy reference	Summary of main issues
	<p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comments.</li> </ul>
<p>SA44: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road</p>	<p><b>Specific bodies (statutory)</b></p> <ul style="list-style-type: none"> <li>The Environment Agency notes the site have been identified as partly or fully overlying historic landfills: Development on historic landfills may require an Environmental Permit. Developers for these sites would need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Landowners note given proximity to Enfield Crematorium and given this piece of land is not delivering any public amenity, it would be better to allocate this site for burial. It is odd this hasn't been assessed as a suitable location for burial. This is allocated for Mixed Use but it is Green Belt and this would be inappropriate development on Green Belt given there are enough brownfield sites in Enfield to accommodate development needs.</li> <li>Landowners strongly support the proposed allocation of the site for mixed use development and promotes its release from the Green Belt and local open space designation. The delivery of the site will support the objectives of draft policy SP SS1. The objectives of draft Policy SP SS1 are supported and the proposed allocation of the site is considered to help support these.</li> <li>Landowners note the site is considered to be make an important contribution to the mix of proposed allocated sites in the borough as it provides land that: <ul style="list-style-type: none"> <li>supports the delivery of housing in the borough with a mix of housing types, including townhouses and flat, to provide choice and to meet demand in line with the Local Plan and London Plan. The site is likely to be better suited to the delivery of townhouses, with affordable homes to support families, then smaller and more constrained urban sites where flatted development is more likely to come forward.</li> </ul> </li> </ul>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>– provides the opportunity to deliver accessible and public open space to serve the new homes and local communities, utilising the large site areas to provide ample open spaces to suit all age groups, with features to encourage active lifestyles and community growing initiatives. The site also offers the opportunity to deliver allotments within part of the site, which lies within an area of deficiency in allotment provision (as identified in the adopted North East Area Action Plan).</li> <li>– Urban sites are less likely to be able to offer these features on such a large scale, or if they are, it will likely be more constrained. The masterplan will enable part of the site to be delivered as open local space, this land will be able to be designated for this use, to ensure its long-term protection for this purpose.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Resident Groups objected to the inclusion of this site and have noted the prospect of losing this valuable green belt asset for development. Residents enjoy the character of the conservation area and cannot believe the Council is seeking to remove the green belt designation to allow the site to be developed into housing.</li> </ul>
SA45: Land between Camlet Way and Crescent West, Hadley Wood	<p>Objections were received from residents as well as support from developers.</p> <p><b>Specific bodies (statutory)</b></p> <ul style="list-style-type: none"> <li>• Hertsmere District Council was supportive of the approach to locate some new housing at Hadley Wood given its proximity to the mainline railway station, but they consider that care should be taken in the layout and design of development on the site to ensure it does not compromise the purposes of the green belt between Hadley Wood and the M25/Potters Bar, and between Hadley Wood and the hamlet of Bentley Heath within Hertsmere. Note - site directly adjoins Hertsmere borough.</li> <li>• Historic England indicates that the site has potential for archaeology relating to the Battle of Barnet. The three fields that make up this area are the last piece of Enfield Chase still owned by the Duchy of</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>Lancaster (since 1419). The site is potentially important as unlike adjacent land it has not been contaminated with green waste and would definitely need pre-determination archaeological fieldwork.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• The Duchy of Lancaster, support the inclusion of the site as a draft allocation in principle and they consider that the site is available now, can accommodate and mitigate identified constraints/ considerations and is capable of being delivered within the next five years.</li> <li>• The Duchy of Lancaster's s design team have undertaken technical assessments and has demonstrated that impacts relating to views of the open countryside could be addressed through a strong landscape strategy; impacts to the significance of the adjacent conservation areas would be limited and could be mitigated by the provision of appropriate landscape buffers and detailed design of development proposals. The design team's technical work indicates that whole allocation is considered suitable for housing development.</li> <li>• The Duchy of Lancaster indicate that consideration would be given to the area of SINC land and presence of Flood Zone 3 surrounding the brook to the north of the site, extending beyond the northern boundary of the site. It is likely that development will need to be located away from this specific location, leaving an area of open space within the site to adjoin the land to the northeast of the allocation, which is designated as Local Open Space. This would present opportunities to retain openness to the area of land to the northeast, resulting in minimal impact to its distinction. It is therefore considered that the impact of the piece of adjacent Green Belt land to the northeast would be minimal</li> <li>• The Duchy of Lancaster indicates that the site is located adjacent to the urban area of Hadley Wood, near Hadley Wood Station. There is a Primary School 300m to the east of the site, with a nursery and a number of other services within the immediate vicinity of Hadley Wood. Bus and train connections to High Barnet allow for access to a range of supermarkets, convenience stores, shops and services. The site's close proximity to a station, and easy access to a range of shops and services, mean it is well located to accommodate housing development and represents a sustainable location.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li data-bbox="674 288 2029 791">• The Duchy of Lancaster indicates the site is currently pasture/grazing land and there is an area to the north of the site, which is identified as a SINC, Broadgate Pastures. The site promoter’s Ecological Assessment confirms this SINC land hasn’t been appropriately managed and therefore the value of this grassland will likely continue to decline. They indicate that this presents an opportunity for any future development on the site to enhance this area of SINC, which help to retain the open character of the site. The initial site survey found no evidence of protected species or badgers and no bat roosts were recorded. The presence of trees containing features with potential to support roosting bats was recorded. In themselves, these trees would not preclude development coming forward on the site. There is the potential for birds, dormice and reptiles within the site and its hedgerows. These also would not preclude development from coming forwards on the site if appropriately managed and mitigated. Based on the Ecological Assessment, there is no evidence to suggest any ecological constraints that would preclude development from coming forwards on this site. In fact, the development of the site could bring opportunities to further enhance the current ecological value of the site, in particular the area of SINC land to the north. This evidence supports the continued allocation of the site for residential development within the emerging Local Plan.</li> <li data-bbox="674 823 2029 1126">• The Duchy of Lancaster indicates that the Heritage Report concludes that development within the Site has the potential to impact upon the significance of the Hadley Wood Conservation Area and the Monken Hadley Conservation Area through the introduction of built form within their settings where there was previously none. It states that any such impacts to the significance of these heritage assets would be limited and could be mitigated by the provision of appropriate landscape buffers and the detailed design of the proposed development. Therefore, an appropriately and sensitively designed development could be brought forward on the site, suitably mitigating any potential impacts to heritage assets. The heritage considerations associated with the site are therefore not limiting and should not affect its continued allocation within the emerging Local Plan.</li> <li data-bbox="674 1158 2029 1222">• The Duchy of Lancaster indicate that the technical assessments undertaken concluded that the site is suitable for Green Belt release with minimal harm, which can be appropriately mitigated.</li> </ul> <p data-bbox="618 1254 864 1286"><b>Wider community</b></p>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• The wider community consider that the proposed site allocation runs contrary to the national advice on the importance of protecting the Green Belt, biodiversity and aims of climate mitigation.</li> <li>• The wider community consider that the Council has not identified the exceptional circumstances as to why this site should be released for housing.</li> <li>• The wider community indicate that there is potential harm to the local character and no account has been taken of the fact that the site forms part of the Hornbeam Hills Area of Special Character. It also ignores the fact that the area has significant historic value as it was where the Battle of Barnet took place in the 15th Century. This historical aspect is celebrated, preserved and conserved for educational purposes and pertinent to locals and visitors.</li> <li>• The wider community consider that the site should not be classed as 'Available' and should not be included as an allocated site. The existing agricultural tenant has a lease on the land which runs way beyond 5 years and is therefore not available for development. The Council should not be looking to allocate this green belt site for a development in 10-year time, as there will be other brownfield opportunities to replace these 160 homes within that timeframe.</li> <li>• The wider community consider that the current properties in Hadley Wood are of a high standard and the influx of 'affordable' living would lower the value of all the properties in the area</li> <li>• Residents were concerned that the site is adjacent to a Conservation Area and Grade II Listed Building. Adding to the concerns were around issues relating to public transport – PTAL is the lowest in Greater London (PTAL 0, 1a and 1b) and there are no local services and infrastructure.</li> <li>• Residents highlight that the area is in an Area of Special Character and there is no evidence from the council as to why it is no longer appropriate</li> <li>• Residents were concerned that there had been a lack of consultation on this site.</li> <li>• Residents indicated that there is merit in developing this site, but only if development brought along a long list of improvements such as mix of housing, better local links, better water management, local services and at least 10% of biodiversity net gain.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• Several residents suggested that money was exchanged between the council and the Duchy of Lancaster.</li> <li>• Several residents highlighted the value of the site as rough pasture, listing the species of wildlife which can be found there.</li> <li>• Residents argued that the location of the site would lead to car-dependent development, as necessary amenities are some distance away and public transport options are limited.</li> <li>• Residents emphasised that 160 homes fail to make the most of the site, and the small scale of development would not warrant the infrastructure investment needed to properly support residential development.</li> </ul>
SA46: Crown Road Lorry Park	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency noted that the site is proposed for an industrial use. They have identified the site as partly or fully overlying historic landfills and highlight that development on historic landfills may require an Environmental Permit. Developers for these sites would need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• LBE Strategic Property Services expressed support for the site allocation. They proposed that site could deliver new employment / industrial uses via both small and medium units and deliver up to 50,000 sq. ft. (4,645 sqm.) of new floorspace. This is marginally more than the 4,530-sq. m proposed as part of the site allocation. They suggest the potential level of development is reviewed with the Council.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No comments were received.</li> </ul>

Chapter or policy reference	Summary of main issues
SA47: Ravenside Retail Park	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The Environment Agency flag groundwater considerations as relevant to the site. They recommended planning conditions for any piled foundation proposals and advise the use of piled foundations would require a robust supporting Foundation Works Risk Assessment demonstrating that they are appropriate at the particular location and would not result in a deterioration of groundwater quality. Without such a risk assessment they state they would object to the use of piled foundations. They also identified the site as partly or fully overlying historic landfills and flagged that development on historic landfills may require an Environmental Permit. They indicate developers would need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Prologis expressed support for the allocation, which mirrors their longer-term intentions for the site. They stated that 5-10-year delivery timeframe is sensible. Floorspace/ format broadly supported, but with the caveat that delivery dependent on economic circumstances/ the needs of occupiers.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comments were received.</li> </ul>
SA48: Land at 135 Theobalds Park Road	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The Environment Agency noted that the site has a proposed industrial use.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>CPRE London argue that the site should not be allocated for inappropriate development as it forms part of the Green Belt.</li> <li>Lansdown Land set out a range of benefits which could arise from the development of the site for the purposes outlined in the site allocation – including employment, placemaking and sustainability.</li> </ul>

Chapter or policy reference	Summary of main issues
	<p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• One respondent raised issues of traffic and cyclist and pedestrian safety and questioned how the proposed allocation would fit in with housing aspirations for the wider area.</li> </ul>
<p>SA49: Land to the south of Millmarsh Lane, Brimsdown Industrial Estate</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency noted that the site has a proposed industrial use.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Enfield Climate Action Forum comment on the lack of housing proposed as part of the site allocation.</li> <li>• DTZ Investors observed that it is unusual for the site to be allocated for industrial use when it lies within SIL. They argued that the floorspace capacity proposed is too prescriptive as it would be premature to set a minimum figure that would need to be achieved as part of any future redevelopment, and that PTAL has been incorrectly stated.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community raised concern over the issues of congestion and the need for improved bus routes.</li> </ul>
<p>SA50: 6 Morson Road</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency noted that the site has a proposed industrial use. Highlighted that the site is within a 250m radius of a potable groundwater abstraction, and strongly advise that the abstraction licence holder is also consulted with respect to piled foundation proposals. Also indicated the site as partly or fully overlying historic landfills; indicated that development on historic landfills may require an Environmental Permit. Advise that developers would need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.</li> </ul>

Chapter or policy reference	Summary of main issues
	<p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Tarmac Trading Ltd indicated support and reaffirmed the site's availability and deliverability. They requested that the site allocation is amended to provide greater flexibility with regards to floorspace.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comments were received.</li> </ul>
SA51: Montagu Industrial Estate	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The Environment Agency noted that the site has a proposed industrial use and lies within SPZ1. Highlighted that the site is within a 250m radius of a potable groundwater abstraction, and strongly advise that the abstraction licence holder is also consulted with respect to piled foundation proposals. Also indicated the site as partly or fully overlying historic landfills; indicated that development on historic landfills may require an Environmental Permit. Advise that developers would need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Henry Boot advised that the red line boundary should cover the entirety of the site and requested further clarity on how the site capacity has been calculated, amongst detailed suggestions for revisions.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comments were received.</li> </ul>
SA52: Land west of Rammey Marsh	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The Lee Valley Regional Park Authority indicated their support in principle. They indicated willingness to work with the council on the master planning of this area of the Park to ensure the appropriate and sensitive redevelopment of the land. Further information requested on the Green Belt status of the</li> </ul>



Chapter or policy reference	Summary of main issues
	<p>site. They observed that the site proforma is lacking in detail and should address the location in terms of the Regional Park and the comprehensive environmental, ecological, landscape and access improvements that would be required. State the inclusion of ecological enhancements within SA52 as part of its redevelopment would assist in strengthening the links between the Regional Park and Enfield Chase as part of the arc of open spaces identified in PL8. They consider it would be helpful to understand the policy requirements for PL8 in terms of this site.</p> <ul style="list-style-type: none"> <li>• Broxbourne District Council noted that the site includes the Small River Lee and flagged that they are currently preparing an Area Action Plan for Waltham Cross, and the Small River Lea has been identified as having potential as an active travel corridor between the two boroughs under the M25. They suggest that LBE should consider how this could be accommodated as a part of evolving masterplans for site SA52, flag there may be implications for any proposed new M25 junction and welcome a discussion regarding this.</li> <li>• Hertfordshire County Council required assurance from Enfield through the planning process that this site does not severely impact on the strategic transport network across the border in Hertfordshire – namely the A10, M25 and rail lines. This is particularly pertinent as this site is intended to be primarily industrial, and therefore is likely to create significant numbers of HGV movements which cannot easily be mitigated for.</li> <li>• The Environment Agency noted that the site has a proposed industrial use and lies within SPZ1. Highlighted that the site is within a 250m radius of a potable groundwater abstraction, and strongly advise that the abstraction licence holder is also consulted with respect to piled foundation proposals. Also indicated the site as partly or fully overlying historic landfills; indicated that development on historic landfills may require an Environmental Permit. Advise that developers would need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• CPRE London highlighted the site is strongly performing in its Green Belt function. They identified the importance of green spaces such as the site supporting London’s ability to adapt to extreme weather events and mitigate climate change.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• LBE Conservative Group expressed opposition to the release of the site from Green Belt.</li> <li>• Cllr Stephanos Ioannou objected to the inclusion of the site as a proposed site allocation. The respondent considered that the proposal would remove part of Rammey Marsh, a wildlife area and public amenity, from the Green Belt.</li> <li>• Cllr Clare De Silva expressed concern about the inclusion of the site, its respective development and impacts on wildlife and wetlands areas – as these areas provide opportunity for leisure and create pockets of natural green space which we cannot afford to lose.</li> <li>• GLP strongly supported the inclusion of the proposed allocation on the ground of poor performance against Green Belt objectives, the ability to appropriately manage traffic flows, and economic benefits. Flexibility is sought to ensure all development priorities can be achieved.</li> <li>• LBE Strategic Property Services supported the inclusion of the site. They suggest that the potential development capacity of the site could be fully optimised.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Representations received from the wider community expressed concern at the removal of the site from the Green Belt, characterising the site as a wildlife area and public amenity.</li> <li>• The wider community also objected on the inclusion of the site potentially removing the biodiversity value of the site, including a range of plant species such as the Bee Orchid. The proposed removal was characterised as inconsistent with the battle against climate change, and also the need to enhance biodiversity.</li> </ul>
SA53: Car park site, Wharf Road	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The Environment Agency noted that the site has a proposed industrial use and lies within SPZ1. Highlighted that the site is within a 250m radius of a potable groundwater abstraction, and strongly advise that the abstraction licence holder is also consulted with respect to piled foundation proposals. Also indicated the site as partly or fully overlying historic landfills; indicated that development on</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>historic landfills may require an Environmental Permit. They advise that developers would need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• SEGRO indicated that an exceptional circumstances case exists to warrant the removal of the site from the Green Belt. They requested that the site is designated LSIS and not washed over by Green Belt designation. They consider that the site has a lower floorspace capacity than that set out in the site allocation and could come forward sooner (0-5 years).</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No comments were received.</li> </ul>
SA54: Land east of Junction 24 of the M25	<p>Objections were received from local residents, statutory consultees, neighbouring authorities and local interest groups, as well as some support from developers.</p> <p><b>Specific bodies (statutory)</b></p> <ul style="list-style-type: none"> <li>• Hertfordshire County Council wants reassurance from Enfield through the planning process that this site does not severely impact on the strategic transport network across the border in Hertfordshire – namely the M25 and B556. This is particularly pertinent as this site is intended to be primarily industrial, and therefore is likely to create significant numbers of HGV movements which cannot easily be mitigated for.</li> <li>• TfL is particularly concerned about the employment site proposed at land east of junction 24 of the M25 (SA54) which is likely to be dependent on car access due to the proximity to the motorway junction and relatively poor public transport connectivity with a PTAL of 1a-b. It highlights that Table 9.2 is incomplete as it fails to recognise the access and transport issues that would overwhelmingly favour option A to meet the Borough’s industrial and logistics needs in the urban area. TfL is likely to</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>object on strategic transport grounds to option B which sets out to meet the Borough's industrial and logistics needs in the urban area and selected Green Belt sites.</p> <ul style="list-style-type: none"> <li>• TfL highlighted that without substantial investment in active travel and public transport connectivity, which is likely to be costly and may not be viable and is therefore concerned that this site is likely to be dependent on car access due to the proximity to the motorway junction and relatively poor public transport connectivity with a PTAL of 1a-b.</li> <li>• Hertsmere District Council would not support a proposal that sees development to the south of the strong and permanent green belt boundary provided by the motorway, resulting in encroachment into the countryside and a narrowing of the gap between Hadley Wood and Potters Bar.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• LBE Property Services support the inclusion of the site as a draft site allocation and suggests that the site has the potential for further intensification that could accommodate 75,000 sq. m of employment floorspace.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community objected to the inclusion of the site as a draft site allocation. They consider that this site is Green Belt and entirely inappropriate for development of the type proposed. It meets all the Green Belt criteria and therefore should not be included for development.</li> <li>• The wider community objected to the inclusion of the site as a draft site allocation. They consider that industrial development here would ruin the green gateway to Enfield Chase, and traffic implications on the A1005 and A111 would be hard to mitigate.</li> <li>• The wider community recognise that the site is within the Enfield Chase Heritage Area of Special Character (Section 4). The Enfield Characterisation Study states: "The presence of such attractive and well-maintained landscapes close to the urban edge is a valuable asset for the borough. They provide a landscape setting for the borough and an attractive gateway area when entering and leaving the borough to the north." (page 159).</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>Residents consider that the consultation provides no evidence to support the need for a logistics hub at Junction 24 of the M25. It is not clear if there is a real requirement for the service or if the proposed hub is designed to attract business away from the other hubs close by in Essex, in this case making the proposal unnecessary and in addition risky.</li> </ul>
SA55: Land to the north west of Innova Park	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>The Environment Agency noted that the site has a proposed industrial use and lies within SPZ1. Highlighted that the site is within a 250m radius of a potable groundwater abstraction, and strongly advise that the abstraction licence holder is also consulted with respect to piled foundation proposals. Also indicated the site as partly or fully overlying historic landfills; indicated that development on historic landfills may require an Environmental Permit. Advise that developers would need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.</li> <li>The Lee Valley Regional Park Authority observed that the development of the site offers an opportunity to look comprehensively at what can be achieved in this area and offered to work closely with the Council on the master planning of this area of the Park to ensure the appropriate and sensitive redevelopment of the land. They indicated that the site proforma is lacking in detail and should address the location in terms of the Regional Park and the comprehensive environmental, ecological, landscape and access improvements that would be required. Further information requested regarding the Green Belt status of the site. They consider that it would be helpful to understand the policy requirements for PL8 in terms of this site.</li> <li>Hertfordshire County Council requested assurance that this site does not severely impact on the strategic transport network across the border in Hertfordshire – namely the A10, M25 and rail lines. They argued this is particularly pertinent as this site is intended to be primarily industrial, and therefore is likely to create significant numbers of HGV movements which cannot easily be mitigated for.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>Thames Water as the landowner of the site expressed support for removal of the site from Green Belt and its allocation for employment purposes. They considered the floorspace figure of 16,445 sq. m</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>reasonable and deliverable. They objected however to the wildlife corridor designation. Considered that exceptional circumstances exist for the release of this land from the Green Belt and that the council should set this out in evidence-based assessment produced for the next stage of the Local Plan.</p> <ul style="list-style-type: none"> <li>• CPRE London identified the importance of green spaces such as the site supporting London’s ability to adapt to extreme weather events and mitigate climate change.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• No comments were received.</li> </ul>
SA56: Land at Picketts Lock	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• The LVRPA would wish to see a much more extensive area included given the leisure and sporting activities across the wider site. It is also confusing that explanatory text to the policy groups together the Hotspur training ground, Pickett’s Lock, Enfield Playing Fields and Firs Farm as suitable locations for the development of world-class sports villages – this is not a proposal that the Authority has identified for Pickett’s Lock.</li> <li>• The Environment Agency has identified this site as partly or fully overlying historic landfills: Development on historic landfills may require an Environmental Permit. Developers for these sites would need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.</li> <li>• Sport England highlight that any new sports and leisure facilities should meet a strategically identified need.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• CPRE London consider that the site is Green Belt and should remain so to avoid erosion of the stretch of Green Belt in the area which is the Lea Valley Regional Park. They support the removal or reduction of surface car parking (in line with sustainable transport objectives) but do not support</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>development which would be inappropriate: the land should remain open. The allocation should be explicit that any 'new sports, recreation and leisure facilities' would need to comply with Green Belt policy.</p> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>Residents consider that the site would require significant travel to reach it and therefore not publicly accessible.</li> </ul>
<p>SA57: Whitewebbs Golf Course, Beggar's Hollow, Enfield</p>	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>Sport England is not clear if the golf course is surplus or would be replaced therefore since the allocation suggest its loss it appears this allocation is contrary to the NPPF, paragraph 99, and Sport England Policy.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>CPRE London is not clear why this site is included as a Site Allocation when the proposal is 'to provide nature recovery uses'. They consider that this is part of a public park and the Local Plan should be clear that it exists for public amenity and this should be referenced in the site allocation and remain a public park, for public amenity. However, they consider that the site could provide nature recovery uses – but this should sit alongside its public amenity purpose.</li> <li>Tottenham Hotspurs Football Club highlights that the former Whitewebbs Golf Course should not be identified as a nature recovery area. They consider that SA57 should be included in the allocation SA62. The nature recovery area should include the woodland, beyond the SA57 allocation, i.e. to its west and should be incorporated into the SA62 Site Allocation and should also be extended to include land to the west.</li> <li>A local Politician object to its inclusion as site allocation and considers it to conflict with draft Policy CL4</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>• LBE Property Services support the inclusion of the site allocation</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Residents considered that the ancient woodland must be protected at all costs</li> <li>• The wider community suggested that the inclusion of the site should include multiple sports and not just a focus on one sport, so the creation of designated cycling, skateboarding, running and walking paths, a gym, a tennis and squash court, a multipurpose venue to allow and encourage participatory and performance arts, a community cafe with links with local schools and community outreach groups, including charities within Enfield.</li> </ul>
SA58: Alma Road open space	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Sport England objects to this site allocation as historic aerial photographs indicate that there were playing pitches on this site therefore it falls within the definition of a playing field. It does not appear, therefore, that the requirements of the NPPF, paragraph 99, would be met at this stage.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• Enfield Road Watch object to the use of Metropolitan Open Land [MOL] for new crematoria, specifically SA58 Alma Road Open Space, SA59 Firs Farm Recreation Ground (part) and SA61 Church Street recreation ground. They consider that these sites are too important to the health and well-being of Enfield residents and are afforded the same level of protection as Green Belt.</li> <li>• CPRE London considers that this site should not be included for burial use because this is an area deficient in open space for public recreation. It is also an area which is likely to see population densification so it should be safeguarded to ensure adequate green space provision for the area, with reference to green space standards and the Playing Pitch Strategy. A better alternative would be site SA44 (Land opposite Enfield Crematorium) which currently provides no public amenity but is Green Belt and so should not be allocated for development as currently proposed.</li> </ul>



Chapter or policy reference	Summary of main issues
	<p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community wants to see more detail about the new burial spaces with regard to accessibility, public access and urban greening.</li> </ul>
SA59: Firs Farm recreation ground (part)	<p>Objections were received from residents and local politicians. Adding to the objections, a petition was also received by the council to remove the site from the ELP (date) and considered at Overview and Scrutiny Meeting (Nov-21).</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Sport England object to the inclusion of this site as a draft allocation, as it seeks the loss of playing field which the PPS states requires protection.</li> <li>• The Environment Agency – highlights that the following information in regard to groundwater protection relates to the following sites. Sites within SPZ1 are particularly sensitive with respect to groundwater, and additional constraints will be placed on the above development proposals. With respect to the Environment Agency’s Approach to Groundwater Protection, the following chapters would apply to these sites: <ul style="list-style-type: none"> <li>○ D1-General principles-all storage facilities</li> <li>○ D2-Underground Storage (and associated pipework)</li> <li>○ D3-Subwater table storage</li> <li>○ G2- Sewage Effluent Discharges within SPZ1</li> <li>○ G4- Trade effluent and other discharges within SPZ1</li> <li>○ G8-Sewage pipework</li> <li>○ G13- Sustainable Drainage systems</li> </ul> </li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li>○ N7- Hydrogeological risk assessment</li> <li>○ N8-Physical disturbance of aquifers in SPZ1</li> </ul> <ul style="list-style-type: none"> <li>● The EA would recommend planning conditions for any piled foundation proposals at these sites. The use of piled foundations would require a robust supporting Foundation Works Risk Assessment demonstrating that they are appropriate at the particular location and would not result in a deterioration of groundwater quality. Without such a risk assessment we would object to the use of piled foundations at these sites.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>● Local politicians, Bush Hill Park Residents Association and Southgate District Voice object to the inclusion of this site as an allocation. They consider that recreation is an important contribution to a healthy life-style and reduces the costs to the local health system. Additionally, these proposals appear contrary to Policy DM CL5 (page 280) which (point 2) states Development proposals that result in the loss of sports and recreational buildings and land will be resisted unless: <ul style="list-style-type: none"> <li>a) an assessment has been undertaken which has clearly shown the facilities to be surplus to requirements; or</li> <li>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in a suitable location; or</li> <li>c) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</li> </ul> </li> <li>● CPRE London object to the inclusion of this site as an allocation for burial use because this is an area deficient in open space for public recreation. It is also an area which is likely to see population densification so it should be safeguarded to ensure adequate green space provision for the area, with reference to green space standards and the Playing Pitch Strategy. A better alternative would be site SA44 (Land opposite Enfield Crematorium) which currently provides no public amenity but is Green Belt and so should not be allocated for development as currently proposed.</li> </ul>

Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li data-bbox="667 288 2033 555">• Friends of Firs Farm object to the inclusion of this site as an allocation as the proposals will all reduce the effectiveness of the work done to date, and will therefore reduce the value of the significant investment of money, time, other resources and good will that the various partners working at Firs Farm have put into the project to date. By designating the area for burial/crematorium use, the longer-term future of the community hub proposal is seriously in doubt. As a result, the funding already secured from third parties is likely to be lost, and the time and resources expended in development the proposal to date will have been wasted. It seems likely that third party funders such as Thames 21 may have their confidence in Enfield Council as a trusted partner undermined.</li> <li data-bbox="667 587 2033 751">• Friends of Firs Farm consider that the boundaries of the proposed location SA59 for burial/cremation use encroaches into the SINC to the northern and eastern ends of this site. The proposal will adversely affect the hedgerows and other biodiversity resources, and this may be to the extent that the justification for the SINC status is compromised. In any event, the proposal is not consistent with the stated policy aims of protecting and enhancing the SINC. [BG2]</li> <li data-bbox="667 783 2033 948">• Enfield Road Watch object to the use of Metropolitan Open Land [MOL] for new crematoria, specifically the inclusion of draft site allocations: SA58 Alma Road Open Space, SA59 Firs Farm Recreation Ground (part) and SA61 Church Street recreation ground. These sites are too important to the health and well-being of Enfield residents and are afforded the same level of protection as Green Belt.</li> <li data-bbox="667 979 2033 1080">• Winchmore Hill Residents Association objected to the inclusion of this site as an allocation. They state there is no recognition in the Local Plan of its ecological and community significance; especially as there are plans to build a community hub on this location.</li> <li data-bbox="667 1112 2033 1345">• Better Homes Enfield do not support the use Firs Farm Recreation Ground and Church Street Recreation ground for burial or crematorium use. Each of these areas already plays an important (and growing role) role in the greenspace and recreational provision of local urban communities. Alma Road Open Space should be used as part of a connected network of greenspaces across the borough. This could be included alongside cemetery use, but this should be explicitly defined in the plan. They consider that all three of these sites may be better suited to greenbelt areas such as Sloemans Farm, due to the peaceful nature of these areas. Furthermore, urban crematorium sites,</li> </ul>

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	<p>and, to a lesser extent, burial sites will increase traffic in urban areas and negatively impact air quality.</p> <ul style="list-style-type: none"> <li>• Developer D&amp;JLP is pleased to see that London Borough of Enfield has clarified the status of the Firs Lane site in the notation shown on the draft proposals Map accompanying the draft Local Plan. The draft Proposals Map clearly shows the site as not being part of the adjoining open space even though it is still shown as being in the MOL. This change from the current Local Plan Proposals Map acknowledges the status of the site as a brownfield site, i.e., ‘previously developed land’. The consequence of this being that development of the site would not be ‘inappropriate’.</li> <li>• LBE Property Services support the inclusion of the draft allocation to meet the needs of the community.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• Significant objections received from the local community on SA59. Firs Farm it is an important and highly valued open space contributing to the mental and physical health and well-being of the people of Enfield. A crematorium or burial ground within the area would destroy this opportunity.</li> <li>• The wider community wants the Council to remove from the Local Plan the proposal to build a crematorium/burial ground in Firs Farm.</li> <li>• The wider community object to the inclusion of the site as an allocation. They consider that the proposal would involve a loss of sports and recreational buildings contrary other policies in the plan as highlighted by the wider community and Sport England</li> <li>• The wider community was concerned that the development of the crematorium and its operation will all reduce the effectiveness of the work done to date and will therefore reduce the value of the significant investment of money, time, other resources and good will that the various partners working at Firs Farm have put into the project to date. By designating the area for burial/crematorium use, the longer-term future of the community hub proposal is seriously in doubt.</li> <li>• The wider community indicated that the proposed cremation/burial use at Firs Farm does not constitute the very special circumstances to warrant development on MOL. Although cemeteries and</li> </ul>

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	<p>burial grounds are identified as not inappropriate on Green Belt/MOL (Paragraph 149 (b)), crematoria are not specifically mentioned, which relates to the regulation of the cremation of human remains under the statutory Local Air Pollution Prevention and Control (LAPPC) regime. The draft Local Plan also has provided little or no evidence to support the inclusion of this proposal, either in terms of its need or how the site at Firs Farm was identified and evaluated in relation to other options.</p> <ul style="list-style-type: none"> <li>The wider community raised concern that the development would negatively impact the SINC and negatively impact biodiversity and reduce the effectiveness of flood alleviation provided by the wetlands. Adverse impacts to traffic and the environment generally were also raised as issues.</li> </ul>
SA60: Sloemans Farm	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>No comments received</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>CPRE London support the inclusion of the site as an allocation in the Green Belt</li> <li>Bush Hill Park Residents Association object to the proposed use of the site, because recreation is an important contribution to a healthy life-style and reduces the costs to the local health system. This SA appears to be contrary to Policy DM CL5 (page 280) which (point 2) states Development proposals that result in the loss of sports and recreational buildings and land will be resisted.</li> <li>The Enfield Society supports the inclusion of the site as an allocation in principle but considers there is a lack of clarity in the proposal as to whether any ancillary built development is proposed within the site, what landscape impacts there might be and how these might be managed, how the Public Right of Way that passes through the site from north to south will be maintained, and how the rural character and frontage onto Whitewebbs Lane will be maintained</li> <li>LBE property services support the inclusion of the site as an allocation natural burial uses. However, they consider that the smaller south western part of the site represents a logical and sustainable location for future residential development for approximately 57 to 95 new homes, based on 30-50 dwellings per hectare ('dph') and a net developable area of c. 60%. Proposals would include a policy</li> </ul>

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	<p>compliant level of affordable housing and other requirements. The site could also potentially come forward for employment-related uses if required.</p> <ul style="list-style-type: none"> <li>LBE property services support the inclusion of the site as an allocation natural burial uses as proposals would meet identified burial needs in Enfield. They consider this use will sit comfortably alongside the Green Belt and London National Park City designations for the site</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>No comments received from the wider community relating to this policy.</li> </ul>
SA61: Church Street Recreation Ground	<p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>Sport England object to the inclusion of this site as an allocation because of the loss of playing field. The PPS seeks the Local Plan to protect the site and advocates improvements. In addition, Sport England, ECB, Football Foundation and the Council have been working together to install an artificial cricket wicket in this location as part of recent mitigation package for approved development at the adjacent Latymer School.</li> </ul> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>CPRE London does not support the inclusion of the site as a proposed allocation because the site is in an area deficient in open space for public recreation. It is also an area which is likely to see population densification so it should be safeguarded to ensure adequate green space provision for the area, with reference to green space standards and the Playing Pitch Strategy. A better alternative would be site SA44 (Land opposite Enfield Crematorium) which currently provides no public amenity but is Green Belt and so should not be allocated for development as currently proposed.</li> <li>The Enfield Society object to the use of Metropolitan Open Land [MOL] for new crematoria, specifically SA58 Alma Road Open Space, SA59 Firs Farm Recreation Ground (part) and SA61 Church Street recreation ground. These sites are too important to the health and well-being of Enfield residents and are afforded the same level of protection as Green Belt.</li> </ul>

Chapter or policy reference	Summary of main issues
	<p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community object to the inclusion of this site as an allocation. They consider recreation is an important contribution to a healthy lifestyle and reduces the cost to the local healthcare system.</li> <li>• Residents were concerned that the inclusion of this site as an allocation would appear contrary to draft ELP policy CL5.</li> <li>• Residents pointed out that Enfield has two crematoria which should be sufficient and therefore the proposals at SA61 would not be required. They considered that the location is not suitable as mourners would have to negotiate the A10/A406 roundabout on exit. Many of the local community avoid this at all times.</li> <li>• Residents considered that there were more appropriate sites to meet burial needs in the Green Belt.</li> </ul>
<p>SA62: Land at and within the vicinity of Tottenham Hotspur Football Club training ground, Hotspur Way, Whitewebbs Lane</p>	<p>Mixed views were received. Objections were received from local residents and local interest groups, as well as some support from developers.</p> <p><b>Specific Bodies (Statutory)</b></p> <ul style="list-style-type: none"> <li>• Sport England raises concerns about the inclusion of this site as an allocation. They consider that it is not clear if the expansion of the Tottenham Hotspurs Training Centre would meet locally identified needs. In addition, if the expansion results in the loss of sports facilities, then in order to meet the NPPF, paragraph 99, and Sport England Policy it must be robustly demonstrated that the facility that would be lost is either surplus in an assessment or replaced, especially since the PPS does not highlight a community need for the proposed facility at present. It notes that lack of use should not be seen as necessarily indicating an absence of need for a specific sports facility in the locality. Such land can retain the potential to provide to meet current or future needs.</li> <li>• TfL Spatial Planning object to the inclusion of SA62: Land at Tottenham Hotspur FC training ground as the site is likely to be dependent on car access due to the relatively poor connectivity by active travel or public transport with a PTAL of 1a-b. The site proposals (including ancillary related facilities)</li> </ul>

Chapter or policy reference	Summary of main issues
	<p>should exclude major trip generating uses unless there is substantial investment in viable public transport and active travel improvements.</p> <p><b>General bodies / other organisations</b></p> <ul style="list-style-type: none"> <li>• CPRE London objects to the inclusion of SA62: Land at and within the vicinity of Tottenham Hotspurs Football Club training ground as it is in the Green Belt which is performing an important function. They consider it should not be subject to inappropriate development. It should certainly not be removed from Green Belt.</li> <li>• CPRE London highlight that it does not appear to be a genuine allocation for development of “professional sport, recreation and community sports/leisure uses”: rather, it appears to be an allocation aimed at enabling the expansion of the football club’s training facilities. There is no need to allocate this site within the Local Plan – and indeed this allocation is inappropriate, and it should be removed. They consider if Tottenham wish to expand the appropriate route would be via a planning application.</li> <li>• Tottenham Hotspurs Football Club support the inclusion of the site as an allocation. They consider that the proposed identification of their Training Ground and adjoining land as being an area of sporting excellence where further associated development will be supported in principle, subject to a range of development management criteria.</li> <li>• Friends of Forty Hill Park object to the inclusion of SA62 as it is inappropriate for THFC to expand and damage more of the local area. Lack of public access to their area of Forty Hill.</li> </ul> <p><b>Wider community</b></p> <ul style="list-style-type: none"> <li>• The wider community object to the inclusion of the site as an allocation. They consider that the site is in the Green Belt which is performing an important function and should not be subject to inappropriate development and therefore not be removed from Green Belt.</li> </ul>



Chapter or policy reference	Summary of main issues
	<ul style="list-style-type: none"> <li data-bbox="667 288 1995 384">• The wider community consider that the site does not appear to be a genuine allocation for development of “professional sport, recreation and community sports/leisure uses”: They felt that it was rather, an allocation aimed at enabling the expansion of the football club’s training facilities.</li> <li data-bbox="667 416 2018 512">• Several residents were concerned with public land being transferred to private management and call for its reinstatement. The Whitewebbs Golf course is open land, well-used and enjoyed by the public for outdoor recreation. Fencing off portions of this site would impact the openness of the Green Belt.</li> <li data-bbox="667 544 2029 679">• The wider community indicated that the site is part of the historic Enfield Chase - it is unique in the southeast and played an important role in the development of Enfield. It is a rare and valuable landscape asset, and its loss would cause permanent harm not only to the Green Belt, but also to the very character of the borough.</li> </ul>

