

Enfield Local Plan

Regulation 22 Consultation Statement

Report on the consultation of the Enfield Local Plan: Proposed Submission Document

April 2025

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1. Introduction

Purpose of this statement

- 1.1 This Consultation Statement sets out how the Council has involved residents and key stakeholders and specified bodies in preparing the Enfield Local Plan (ELP) 2019-2041 in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI) May 2023.
- 1.3 The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. Full details of the current adopted Enfield SCI 2023 can be viewed <https://www.enfield.gov.uk/services/planning/local-development-scheme#statement-of-community-involvement>.
- 1.4 The Council has also prepared a separate Duty to Cooperate (DtC) Statement of Compliance dated August 2024, which is published on the examination webpage and provides further details on specific DtC matters.

Background to the Enfield Local Plan

- 1.5 This Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the ELP, setting out how such efforts have shaped the Plan and the main issues raised through consultation by representations.
- 1.6 The Council began preparing a revised Local Plan for the borough in 2016. The ELP sets out the strategic vision, objectives and spatial strategy for the Borough, as well as the planning policies which will guide future development over the Plan period.
- 1.7 The Plan will look ahead to 2041 and identify the main areas for sustainable development growth across the borough. It establishes policies and guidance to ensure local development is delivered in accordance with the principles set out in the National Planning Policy Framework (NPPF).
- 1.8 Once adopted, the new ELP will fully replace and consolidate the policies and site allocations in the previously adopted Local Plan within a single new Local Plan. The Development Plan Documents to be replaced upon adoption of the new ELP, are the Core Strategy (2010), Development Management Document (2014), Edmonton Leaside Area Action Plan (2020), North East Enfield Area Action Plan (2016) and North Circular Area Action Plan (2014).
- 1.9 The Draft Local Plan Regulation 19 consultation stage (March 2024) was approved for publication for a minimum 6-week period of public consultation by Full Council on 19 March 2024. The Draft Local Plan and associated supporting documents were also published in accordance with Regulation 19 for the statutory consultation period. During this stage, the Council consulted all specific and statutory consultation bodies, local residents' groups, businesses and individual residents in accordance with the SCI. The Council organised four consultation events during this stage to answer questions from residents and interested parties. Further details of the consultation process and methods used to engage stakeholders are set out in Appendix B of this document.
- 1.10 Concurrent to the ELP Regulation 19 Consultation, the council's Journeys and Places Team consulted on two additional documents which also form part of the wider evidence base for the Local Plan.

Enfield Transport Strategy

- 1.11 This aims to build on the borough's existing transport links and facilities, whilst providing the platform for future enhancements. The purpose of the Strategy is to steer transport planning and policies for the London Borough of Enfield up to 2041.

Enfield Place Shaping Framework

- 1.12 This document will guide the Council's approach to enhancing public spaces and the public realm in Enfield alongside the community. It outlines 11 placemaking areas and details the approach to delivering the broad ambitions for place shaping in the borough.

Structure of this statement

- 1.13 This statement of consultation comprises three sections:
- **Section 1** is an introduction.
 - **Section 2** sets out the timeline which has been followed in preparing the revised Local Plan which is in accordance with the up to date Enfield Local Development Scheme July 2024.
 - **Section 3** summarises the main issues raised during the course of the consultation carried out under Regulation 19 from 28 March to 20 May 2024 by plan chapter. Section 3 is supported by the two Appendices:
 - **Appendix A** provides a summary of the Regulation 18 consultations undertaken between 2016 and 2021. It also demonstrates how the comments have been taken into account by the Council within a schedule of changes between the most recent Regulation 18 Consultation in 2021 and the Regulation 19 draft of the local plan.
 - **Appendix B** further addresses the requirements of Regulation 22(1)(c)(v) and sets out details of the consultation undertaken at the Regulation 19 stage. It also provides and a summary of the main issues raised in relation to each policy by the Regulation 20 representations, alongside Council initial response in plan order. Please note that representations from individuals are summarised in Section 3, with the full schedule of representations available online from the council's website.
- 1.14 This statement was updated on 27 November 2024 as part of Preliminary Questions to the Inspector and subsequently updated on 10 April 2025 following Stage One Examination hearings in January 2025.

2. Enfield Local Plan Production Timeline

- 2.1 The timetable below outlines the main stages in the preparation of the ELP 2019 – 2041 up until the submission date of 6 August 2024. An account of this process, with links to key documents at each stage, can also be found at this webpage:
<https://www.enfield.gov.uk/services/planning/new-enfield-local-plan>

Regulation 18 Consultation

Growth Scenarios – December 2016

- 2.2 In 2016, the Council prepared the document ‘Consultation on a New Plan for Enfield 2017-2032’, which considered the major issues for the borough including on housing, jobs and community facilities. It also set out a series of spatial options for how the borough could grow and develop over the Plan period. This document underwent public consultation between Friday 18 December and Friday 12 February 2016. The consultation sought views on the Local Plan spatial options and asked for respondents to set out their alternative ideas. The consultation also included a call for sites consultation, requesting submission of locations for development.

Issues and Options – December 2018

- 2.3 From 5 December 2018 to 28 February 2019 the Council consulted on the issues and options for the Local Plan for a second time and carried out a consultation to identify future development sites. This initial Regulation 18 document focussed on further exploring broad issues and options but did not indicate the Council’s preferred approach in terms of the scale of growth to be planned for, or in terms of the proposed spatial strategy.

Preferred Approaches – June 2021

- 2.4 From June to September 2021 the Council consulted on the main issues and preferred approach for the Local Plan and carried out a consultation to identify the location of future development sites. This additional Regulation 18 consultation was considered necessary to:
- explore those issues identified through the earlier Regulation 18 consultation;
 - respond to changes in context, including government planning policy; the climate and ecological emergencies, COVID-19 Pandemic, and the recently adopted New London Plan;
 - reflect the new and updated technical evidence base; and
 - identify a preferred spatial growth strategy and preferred policy options.

Pre-Publication Period – December 2023

- 2.5 Whilst not officially a consultation stage, the Council released the draft Plan on 6 December 2023 prior to the formal submission discussion at its Full Council meeting. This enabled the borough’s Councillors to use this time to engage with their constituents and discuss aspirations for homes and the environment. This period was not a statutory consultation but enabled officers time to review, consider, and discuss the content of the Local Plan. As a result of this stage, minor revisions were made to the documentation. Explanations of the minor revisions were provided in an appendix to the Officer Report for Full Council 1.

1 <https://governance.enfield.gov.uk/ieListDocuments.aspx?CId=108&MId=14918>

Accompanying the draft Local Plan release, the Draft Integrated Impact Assessment (IIA) and Draft Habitats Regulation Assessment (HRA) were also published.

Regulation 19 Consultation Period – March 2024

- 2.6 The Draft Local Plan Regulation 19 March 2024 was approved for publication for a minimum 6-week period of public consultation by Full Council on 19 March 2024. The Draft Local Plan and supporting documents, including the Integrated Impact Assessment and Habitats Regulation Assessment, were published in accordance with Regulation 19 for a six-week consultation period lasting from 28 March to 20 May 2024. The Council consulted specific consultation and statutory bodies, local residents' groups, businesses and individual residents in accordance with the SCI and organised four consultation events to answer questions from residents and interested parties on how to respond to the consultation. Further details of the consultation process, and who was consulted, are set out in Appendix B below.

Submission to the Secretary of State – August 2024

- 2.7 The decision by the Council in March 2024 also included a resolution to submit the Draft Local Plan to the Secretary of State for examination following the conclusion of the pre-submission publication period. This Consultation Statement sets out the Council's consideration of the representations received under Regulation 20 in response to Regulation 19 publication (Appendix 2 Schedule 2).

3. Summary of Process and Main Issues

Summary of the consultation process for Enfield Local Plan 2019-2041

- 3.1 Public consultation under Regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations 2012 took place in three stages. Appendix A Schedule A1 of this document provides further details of the issues raised during the three Regulation 18 Consultation stages in summary format. Appendix A Schedule A2 then provides a summary of the key changes made in response to comments made on the evidence base leading up to the Regulation 19 consultation.
- 3.2 The first Regulation 18 stage consultation was undertaken in December 2016 and involved a comprehensive engagement with local communities on potential growth scenarios for Enfield. The consultation document can be found [here](#) and began early engagement to set a direction for future stages of work. It set out a series of options for how the borough could grow and develop in the future. The consultation sought views on the Local Plan spatial options and asked for respondents to set out their alternative ideas. The consultation also included a call for sites consultation, requesting submission of locations for development.
- 3.3 To ensure that all interested parties were given the opportunity to understand and respond to the consultation in late 2018 to early 2019, the Council undertook a comprehensive programme of engagement and consultation relating to the December 2018 “Issues and Options” document, which can be found [here](#). This consultation followed, and in many cases exceeded, the Council’s own standards for public engagement as set out in the relevant SCI at that time, adopted in 2015. The full Consultation Statement addressing the Issues and Options consultation undertaken between December 2018 and February 2019 can be found [here](#).
- 3.4 From June to September 2021 the Council consulted on a final main issues and preferred approaches for the Local Plan which can be found [here](#), and also carried out a consultation to identify future development sites. The full Consultation Statement addressing the Preferred Approaches consultation undertaken between June 2021 and September 2021 can be found [here](#). A full database of all representations made at this stage can also be found [here](#).
- 3.5 The Council published informally a draft of the ELP for information in December 2023 to allow councillors to review the document and to speak to their ward residents. This was followed by a formal Regulation 19 pre-submission publication for six weeks between March and May 2024. Appendix B provides further details of how the requirements of Regulation 22(1)(c)(v) have been met, who was consulted, how they were consulted, the number of representations made pursuant to Regulation 20 and a summary of the main issues raised in those representations. A Council response is also provided to the main issues raised. A high-level summary of the main issues raised at Regulation 19/20 is also given below alongside a summary of the council’s governance process for the ELP.

Summary of the governance process for the Enfield Local Plan 2019-2041

- 3.6 To oversee the preparation of the ELP a Local Plan Cabinet Sub-Committee was formed. More recently (in 2022) this was replaced by a Cross-Party Working Group (CPWG), that was tasked with considering issues relating to the content of the proposed site allocations in the ELP. Elected Members have been kept informed of progress with the ELP through regular updates at: the Environment Forum, Regeneration and Economic Development Scrutiny Panel, Planning Committees, Cabinet and Full Council. More generally, Members have been briefed and engaged on progress with the ELP through bulletins and bespoke email communications, and through Officer led workshops.
- 3.7 The key governance and decision-making arrangements for the ELP are summarised below, with further details available in the Spatial Strategy and Overall Approach Topic Paper.

Table 2-1: Governance and decision-making arrangements for the Enfield Local Plan

Stage	Member Input	Approving Body
Issues and Options Consultation 2015 (Regulation 18)	Requested to approve the Reg 18 Issues and Options Local Plan for statutory consultation.	Local Plan Cabinet Sub Committee (5th November 2015). Agenda ²
The 'Enfield Conversation' 2018 (Regulation 18)	Requested to approve the Reg 18 Local Plan Growth Scenarios and Call for Sites for statutory consultation.	Local Plan Cabinet Sub Committee (24th October 2018). Agenda ³
Enfield Local Plan – Main Issues and Preferred Approaches 2021 (Regulation 18)	Requested to approve the Reg 18 Draft Local Plan (with accompanying supporting documents) for statutory consultation.	Council (9th June 2021). Agenda ⁴
Pre-submission draft ELP 2024 (Regulation 19)	Opportunity for Members to consider a pre-publication draft of the Local Plan 12-weeks prior to the meeting of Council on 6th March 2024. Decision to approve publication draft ELP for consultation and following this consultation, submit the ELP for examination.	Council (March 2024). Agenda ⁵
Adoption of Local Plan document following receipt of Inspector's Report.	Decision to adopt Plan, following receipt of Inspector's Report and associated Main Modifications.	Cabinet and Council (TBC)

² <https://www.enfield.gov.uk/services/planning/evidence-base>

³ <https://www.enfield.gov.uk/services/planning/evidence-base>

⁴ <https://governance.enfield.gov.uk/documents/g9545/Agenda%20frontsheet%2005th-Nov-2015%2019.00%20Local%20Plan%20Cabinet%20Sub-Committee.pdf?T=0>

⁵ <https://governance.enfield.gov.uk/documents/b18599/TO%20FOLLOW%20AGENDA%2024th-Oct-2018%2019.30%20Local%20Plan%20Cabinet%20Sub-Committee.pdf?T=9>

Executive summary of main Issues raised pursuant to Regulation 20 by Plan Chapter

Responses which did not raise any issues and/or supported the plan:

- 3.8 There were no responses which did not raise any issues or supported the plan without reservations.

Responses which referred to the Duty to Cooperate

- 3.9 Further details of the duty to cooperate process are set out in the in Duty to Cooperate Statement <https://www.enfield.gov.uk/services/planning/new-enfield-local-plan>.

Responses which referred to the Integrated Impact Assessment

- 3.10 Troy Planning + Design on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood Forum (HWNF) points out inconsistencies in the Council's supporting documents, particularly the Integrated Impact Assessment, which shows that Site RUR.02 performs poorly against sustainability indicators.
- 3.11 Herts and Middlesex Wildlife Trust commented that the impacts of development on biodiversity value have not been properly assessed through the IIA.
- 3.12 NHS HUDU support Objective 4 of the Integrated Impact Assessment (IIA) aimed at enhancing health and reducing inequalities but express concerns about the environmental and health impacts of Green Belt developments, such as inadequate GP services and increased car use. HUDU calls for timely planning of new infrastructure and services, recommends NHS consultation on plan updates, and supports the inclusion of health and wellbeing monitoring indicators in the plan for IIA compliance.

Responses which referred to the Habitats Regulations Assessment

- 3.13 Regarding air pollution and habitat protection from recreational impacts, Natural England acknowledged Enfield's adopted Recreational Mitigation Strategy but stated the draft Local Plan needs to secure a strategic mitigation package for air pollution impacts on designated sites, especially Epping Forest SAC, before it is adopted. The plan also requires a completed air quality assessment for the HRA and should clarify the policy on biodiversity net gain.
- 3.14 EnCAF objected to the strategic mitigation solution agreed with Natural England in relation to the mitigation proposals for specific sites, and suggested the mitigation was not adequate to prevent adverse impacts on Epping Forest SAC.
- 3.15 HCC acknowledged the work that had been undertaken as part of the Habitats Regulations Assessment and agreed that subject to confirmation from Natural England, impacts on sites in Hertfordshire would be limited.

Responses which referred to other procedural matters

- 3.16 Further details of set out in schedule B.3 of this statement.
- 3.17 Overall, the GLA emphasises the importance of aligning the ELP with the objectives and policies of the London Plan and offers assistance in addressing the identified issues:
- General Conformity with London Plan: The draft ELP needs to align with the objectives of the London Plan (LP2021), particularly regarding the protection and enhancement of open spaces, including the Green Belt.

- Housing: Concerns about the ambitious housing target and reliance on Green Belt release to meet it, as well as the justification for using Government's Standard Methodology in relation to housing need.
- Affordable Housing: While the 50% affordable housing target is supported, there are issues with treating affordable housing thresholds as targets and the need for clarity on tenure split.
- Gypsies and Travellers: The need for provisions to meet the housing needs of Gypsies and Travellers alongside other housing needs.
- Tall Buildings: Lack of clarity and consistency in definitions and regulations regarding tall buildings across different areas of the borough.
- Industrial Land: Concerns about the release of Green Belt for industrial purposes, the need for more clarity on different types of industrial spaces required, and the necessity to protect existing Strategic Industrial Locations (SIL).
- Transport: Doubts regarding the feasibility and sustainability of proposed rural placemaking areas, and the need for robust infrastructure and funding strategies.
- Green Belt: Questions about the justification for releasing Green Belt land, concerns over the suitability of selected sites, and the need to demonstrate exceptional circumstances.

3.18 The schedule of representation summaries contains what appears to be a significant amount of repetition. It would be reasonable to assume that some of this may be because the same representation has been submitted by multiple respondents. Table 2-2 sets out how many representations have been made to each policy and allocation throughout the Regulation 19 consultation process. Overall, the council has so far logged 6,075 unique representors. However, in some cases representations from multiple representors were received from the same email address.

Table 2-2: Number of representations made to each policy.

Name of policy	Number of representations
General and whole plan	1,541
Spatial Portrait	2
Vision	9
Strategic Objectives	7
SP SS1: Spatial strategy	2,334
SP SS2: Making good places	21
SP PL1: Enfield Town	165
SP PL2: Southbury	163
SP PL3: Edmonton Green	13
SP PL4: Angel Edmonton	11
SP PL5: Meridian Water	27
SP PL6: Southgate	20
SP PL7: New Southgate	12
SP PL8: Palmers Green	14
SP PL9: Rural Enfield	31
SP PL10: Chase Park	2,502
SP PL11: Crews Hill	2,163
SP SE1: Responding to the climate emergency	12
DM SE2: Sustainable design and construction	11
DM SE3: Whole-life carbon and circular economy	10
DM SE4: Reducing energy demand and increasing low carbon energy supply	15
DM SE5: Renewable energy development	2
DM SE6: Climate change adaptation and managing heat risk	6
DM SE7: Managing flood risk	13
DM SE8: Protection and improvement of watercourses	5
DM SE9: Sustainable drainage systems	5
SP SC1: Improving health and wellbeing of Enfield's diverse communities	7
SP SC2: Protecting and enhancing social and community infrastructure	8
SP BG1: Enfield's blue and green infrastructure network	1,786
SP BG2: Protecting nature conservation sites	5
SP BG3: Protecting Epping Forest Special Area of Conservation	8
SP BG4: Biodiversity net gain, landscape restoration and offsetting	1,806
SP BG5: Green Belt and Metropolitan Open Land	1,784
SP BG6: Development in the open countryside and greenspaces including in the Green Belt and Metropolitan Open Land	164
SP BG7: Strategy for enhancing the beneficial uses of Green Belt and the Metropolitan Open Land	10
DM BG8: Protecting open space	1,798
DM BG9: Watercourses	1,774
DM BG10: Urban greening and biophilic principles	1,800

Name of policy	Number of representations
DM BG11: Allotments and community food production	4
DM BG12: Burial and crematorium spaces	7
DM BG13: Blue and green infrastructure plans	6
SP DE1: Delivering a well-designed, high quality and resilient environment	7
DM DE2: Design process and design review panel	8
DM DE3: Inclusive design	2
SP DE4: Putting heritage at the centre of place making	6
DM DE5: Strategic and important local views	1,777
DM DE6: Tall buildings	3,179
DM DE7: Creating liveable, inclusive and quality public realm	4
DM DE8: Design of business premises	8
DM DE9: Shopfronts and advertisement	2
DM DE10: Conserving and enhancing heritage assets	1,803
DM DE11: Landscape design	1,772
DM DE12: Civic and public developments	1
DM DE13: Housing standards and design	1,774
DM DE14: External amenity standards	2
DM DE15: Residential extensions and outbuildings	1793
SP H1: Housing development sites	37
SP H2: Affordable housing	31
DM H3: Housing mix and type	19
DM H4: Small sites and small housing development	2,373
DM H5: Supported and specialist housing	5
DM H6: Community led housing	0
DM H7: Build to rent	0
DM H8: Large scale purpose built shared housing	0
DM H9: Student accommodation	4
DM H10: Traveller accommodation	5
SP E1: Employment and growth	33
SP E2: Promoting jobs and inclusive business	10
SP E3: Strategic Industrial Locations	14
SP E4: Supporting offices	5
SP E5: Transforming Industrial Sites	12
DM E6: Locally Significant Industrial Sites	6
DM E7: Non-designated industrial sites	3
DM E8: Providing for workspaces	5
DM E9: Local jobs, skills and local procurement	8
DM E10: Fostering a successful evening economy	0
DM E11: Creating a smart and digitally connected Borough	2
DM E12: Meridian Hinterlands	5

Name of policy	Number of representations
SP TC1: Promoting town centres	4
SP TC2: Encouraging vibrant and resilient town centres	206
DM TC3: Floorspace above commercial premises	2
DM TC4: Markets	0
DM TC5: Meanwhile uses	0
DM TC6: Managing the clustering of town centre uses	2
DM RE1: Character of the Green Belt and open countryside	3
DM RE2: Improving access to the countryside and green corridors	2
SP RE3: Supporting the rural economy	3
DM RE4: Farm diversification and rural employment	1
SP CL1: Promoting culture and creativity	4
DM CL2: Leisure and tourism	4
DM CL3: Visitor accommodation	3
SP CL4: Promoting sporting excellence	18
DM CL5: Sport, open space and recreation	1,773
DM CL6: Protecting and attracting public houses	6
SP T1: A sustainable and decarbonised transport system	25
DM T2: A healthy and connected Enfield	1,576
DM T3: Constructing a vibrant and safe Enfield for everyone	6
DM ENV1: Local environmental protection	9
SP D1: Securing contributions to mitigate the impact of development	11
DM D2: Masterplans and Design Codes to achieve comprehensive development	3
DM D3: Infrastructure and phasing	12
DM D4: Monitoring and review	3
SA1.1: Palace Gardens Shopping Centre	17
SA1.2: Enfield Town Station and Former Enfield Arms	13
SA1.3: Tesco, Southbury Road	10
SA1.4: Enfield Civic Centre	11
SA1.5: St Anne's Catholic High School for Girls	10
SA1.6: 100 Church Street	10
SA1.7: Oak House, 43 Baker Street	6
SA2.1: Colosseum Retail Park	8
SA2.3: Morrisons, Southbury Road	4
SA2.4: Southbury Leisure Centre	4
SA2.5: Tesco, Ponders End	5
SA2.6: Sainsburys, Crown Road	4
SA3.1: Edmonton Green Shopping Centre	9
SA3.2: Chiswick Road Estate	4
SA3.3(URB.24): Fore Street Estate	0
SA4.1: Joyce Avenue and Snells Park Estate	5

Name of policy	Number of representations
SA4.2: Upton Road and Raynham Road	5
SA4.3: Langhedge Lane Industrial Estate	3
SA4.4: South-east corner of North Middlesex University Hospital Trust	4
SA4.5: Public House, 50-56 Fore Street, London	4
SA5.1: Meridian Water Phase 1	10
SA5.2: Meridian Water Phase 2	11
SA5.3: Former IKEA store, Glover Drive	7
SA5.4: Tesco Extra, Glover Drive	5
SA5.5: Meridian 13 (also known as Teardrop)	7
SA5.6: Meridian East (also known as Harbet Road)	10
SA6.1: Southgate Office Village	8
SA6.3: Michenden Car Park and Alan Pullinger Centre	8
SA7.1: Former Gasholder, New Southgate	7
SA7.2: Aldi, New Southgate (formerly Homebase)	4
SA7.3: Ladderswood Estate	6
SA7.4: Arnos Grove Station Car Park	11
SA7.5: Coppice Wood Lodge	3
SA8.1: Morrisons, Palmers Green	7
SA8.2: Lodge Drive Car Park	9
SA8.3: Corner of Green Lanes and the North Circular	3
SA8.4: Travis Perkins, Palmers Green	4
SA10.1: Land at Chase Park	1,009
SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)	44
SA10.3: Chase Park North East	46
SA10.4: Chase Park North West	52
SA11.1: Land at Crews Hill	41
SA11.2: Land South of Cattlegate Road, Crews Hill	45
SA11.3: Land South of M25, Crews Hill	56
SA11.4: Land North and South of Cattlegate Road	69
SA11.5: Land East of Theobalds Road Park, Crews Hill	44
SA11.6: Land South West of Theobalds Park Road	39
URB.01: Land known as Brimsdown Sports Ground	8
URB.02: Cockfosters Station Car Park	16
URB.03: Former Chase Farm Hospital	282
URB.04: Blackhorse Tower, Cockfosters Road	6
URB.05: New Avenue Estate	4
URB.06: Former Middlesex University, Trent Park	5
URB.07: Sainsburys, Green Lanes	29
URB.08: Hoe, Eastfield, Cherry and Bouvier Estates	3
URB.09: Exeter Road Estate	2

Name of policy	Number of representations
URB.10: Alma Estate	6
URB.11: The Former Royal Chace Hotel	3
URB.12: 241 Green Street	5
URB.13: Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate	5
URB.14: Four Hills Estate, Lavender Hill	3
URB.15: Kettering Road Estate	4
URB.16: 188-200 Bowes Road	4
URB.17: Main Avenue Site	3
URB.18: Land at Ritz Parade	5
URB.19: Albany Leisure Centre and Car Park	4
URB.20: Cuckoo Hall Lane Estate	4
URB.21: Moorfield Health Centre	5
URB.22: Oakwood Station Car Park	262
URB.23: Stoneleigh Avenue Estate	4
URB.24: Fore Street Estate	3
URB.25: Pevensey Avenue	5
URB.26: Fords Grove Car Park	13
URB.27: South Street	3
RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road	7
RUR.02: Land between Camlet Way and Crescent West, Hadley Wood	2,679
SA2.2: Heritage House	3
SA2.7: Crown Road Lorry Park	4
SA2.8: Land and buildings north of Lincoln Road	4
SA5.7: Ravenside Retail Park	5
SA5.8: Kenninghall Metals and Waste	2
SA5.6: Meridian East (also known as Harbet Road)	0
URB.32: Claverings Industrial Estate	4
URB.28: Land and buildings south east of Stockingswater Lane	5
URB.29 Land to the south of Milmarsh Lane, Brimsdown Industrial Estate	4
URB.33: 6 Morson Road	5
URB.30: Montagu Industrial Estate	5
URB.31: Snowbird Foods Extension	4
URB 32: Claverings Industrial Area	4
URB 33.6: Morson Road	3
URB.35: Riverwalk Business Park	2
URB.34: 5 Picketts Lock Lane	6
RUR.03: Land west of Rammey Marsh	238
RUR.04: Land east of Junction 24, M25	322
RUR.05: Land to the north west of Innova Park	10

Name of policy	Number of representations
SA6.2: Barnet and Southgate college	4
URB.36: Church Street Recreation Ground	44
RUR.06: Land at Picketts Lock	11
RUR.07: Whitewebbs Golf Course and Land at and within the vicinity of Tottenham Hotspurs Football Club Training Ground, Hotspurs Way, Whitewebbs Lane	42
RUR.08: Sloemans Farm	7
Grand Total	44,283

Other responses by Plan Chapter

Chapter 2: Good Growth in Enfield

- 3.19 Greater London Authority (GLA): The draft ELP needs to align with the objectives of the London Plan (LP2021), particularly regarding the protection and enhancement of open spaces, including the Green Belt set out in London Plan Policy GG2: Making the best use of land.
- 3.20 Transport for London (TFL): TFL acknowledged the work that had been done to embed active travel considerations in the spatial strategy but highlighted the need for more detailed infrastructure delivery plans and coordinated masterplans and supplementary planning documents to delivery these, as well as some changes to wording in Policy SS2: Making Good Places.
- 3.21 National Highways: National Highways' response notes that the Local Plan's strategic vision and spatial strategy align with sustainable development principles. However, they raise concerns about a proposed new logistics hub near Junction 24 of the M25, which could increase commuting and commercial traffic along the M25.
- 3.22 Historic England: Historic England commended the Council's efforts to create well-designed, high-quality environments that respect the historic context but raised concerns around the wider approach to tall buildings. This is considered in more detail below.
- 3.23 Natural England: Natural England welcomes the Local Plan's aim to make Enfield "A deeply green place," focusing on enhanced biodiversity, climate crisis mitigation and adaptation, and the ambition to become a carbon-neutral Borough.
- 3.24 Hertsmere Borough Council: Acknowledgement of the challenges in setting a housing target and the necessity of some Green Belt land release. Commendation for Enfield's approach to affordable housing, aiming for 50% genuinely affordable homes. Concern about the impact on the Green Belt and the need to demonstrate exceptional circumstances.
- 3.25 Welwyn Hatfield Borough Council: Recognises the constraints Enfield faces and express willingness to engage under the Duty to Cooperate. Notes that the stepped trajectory will further add to pressure for development in Welwyn Hatfield in the early years of the plan period and highlights the work that has been undertaken to release substantial areas of Green Belt Land to meet housing needs resulting from London's out-migration. Highlights the results of the Standard Method for assessing housing need in Enfield.
- 3.26 Other London Borough Councils: The London Boroughs of Haringey and Barnet acknowledge the spatial strategy and Green Belt release proposed, with Haringey supporting the designation of placemaking areas, and Barnet welcoming the approach to Enfield's housing target in the plan. Emphasising ongoing engagement, Haringey stresses the need for detailed information on transport and highways impacts from Meridian Water, as many journeys will pass through Haringey, requiring improvements within Haringey. They reiterate the importance of mitigating any transport impacts through joint working and have no comments on other identified sites. LB Barnet noted that the additional traffic flows modelled should not cause undue concern at this stage.
- 3.27 Lee Valley Regional Park Authority (LVRPA): The LVRPA support the spatial vision to establish a high quality, biodiverse and green environment for the well-being and enjoyment of Enfield's residents, employees and visitors. However, they suggest that to ensure the Local Plan is positively prepared and effective the potential of the Regional Park within Enfield should be captured by adding a reference to the Regional Park under the Vision theme 'A Deeply Green Place'.

- 3.28 Enfield Conservative Group: The Enfield Conservative Group asserts that the Draft Plan contradicts national and regional guidelines on Green Belt use, lacking the necessary evidence of exceptional circumstances required for such developments. They argue that the Draft Plan's projected housing growth numbers are unsubstantiated, as they are not supported by current demographic trends showing a decrease in London's population and contend that the Draft Plan's proposals threaten conservation areas, heritage assets, and important vistas. The group argues that transport issues should have been addressed in the Local Plan, not post-finalisation. They emphasise that new developments in these areas won't meet the London Plan's target of 75% non-car trips by 2041 due to poor connectivity and lack of local employment. The group argues that not all avenues for housing supply have been explored, particularly brownfield sites, and that the plan ignores public concerns. They claim the plan unfairly targets Conservative wards for Green Belt development and high-density projects, benefiting the Labour administration politically.
- 3.29 Enfield Climate Action Forum (EnCaf): The EnCaf Land Use Working Group (ELUWG) finds Policy SS1 (Spatial Strategy) non-compliant with relevant legislation and not meeting the tests of soundness. They highlight that the ELP should conform to the London Plan 2021 (LP21), which sets a minimum housing requirement of 18,271 additional homes by 2040/41. ELUWG notes discrepancies in the housing target numbers within the ELP, ranging from 33,280 to 34,710 homes, and emphasises that brownfield/urban sites alone can exceed the LP21 housing requirement, questioning the need to de-designate Green Belt land. The group points out that the ELP underestimates the potential of brownfield/urban sites and has not fully explored these options before proposing Green Belt development. They argue that the ELP's focus on unsustainable Green Belt locations contradicts national policy directives for effective land use and sustainable development. ELUWG also raises concerns about the accuracy and completeness of the Housing and Economic Land Availability Assessment (HELAA) data, the delivery of affordable housing, and the need for family homes in sustainable urban locations. They suggest that the spatial strategy should be revised to better reflect the LP21's housing requirements and promote sustainable development without encroaching on the Green Belt.
- 3.30 Enfield Road Watch: Enfield Road Watch state that beyond 2029, paragraph 4.1.11 of the London Plan refers to local evidence of identified capacity. It is clear that the 'local capacity' referred to means brownfield sites, rather than historic landscapes such as Enfield Chase, which are strongly protected. If it is not possible to accommodate more development beyond 2029, then the only legal way forward is to comprehensively review and re-examine the London Plan, so that the least harmful development sites across the London housing market area can be selected for development, or the housing requirement can be reduced if it is not possible to achieve sustainable development. In fact that is unlikely to be necessary in Enfield because Meridian Water and other regeneration sites identified as the basis of the Enfield number in Table 4.1 have recently started to deliver, behind the schedule anticipated in the London Plan SHLAA, and will continue into the 2030s.
- 3.31 Campaign to Protect Rural England (CPRE) London: CPRE London suggest that the council has used an insupportable, false argument which cannot justify Green Belt release i.e. – that higher housing 'targets' can be accommodated if Green Belt land is released. But this line of argument implies targets are to be set in relation to land availability not as a response to need within the context of land availability. We do not believe this argument holds any water legally, it is an unjustifiable position and makes the plan unsound. The National Planning Policy Framework (NPPF) does not justify Green Belt release solely for housing needs. There is sufficient brownfield land available in the borough to meet housing targets, making Green Belt release unnecessary and counterproductive. Releasing Green Belt land would harm London's environment, contributing to urban sprawl, car dependency, and loss of green spaces and ecosystems. Developing Green Belt land requires extensive infrastructure investment, diverting funds from building affordable homes and essential amenities.
- 3.32 Summary of other responses: Numerous respondents suggested that the approach to setting a housing target in the plan, particularly in the period after 2028/29, was not sound or in

conformity with the London Plan, and that the case for releasing Green Belt was not sound. This is addressed in more detail below in the summary for 6 Chapter Blue and Green Infrastructure. Other respondents including a number of developers and landowners and the Home Builders Federation agreed with the approach to the Spatial Strategy, including in terms of housing, employment space, and town centres. These respondents supported the approach to setting the housing target and the case for exceptional circumstances including Berkeley Homes North East London Ltd. There were some concerns expressed by respondents around the requirements set out in SS2: Making Good Places, particularly the requirement for master planning to take place on larger sites.

Chapter 3: Placemaking areas

SP PL1: Enfield Town

- 3.33 Historic England: Historic England suggest that additional views should be considered in the context of Gentlemen's Row, which contains a very important group of listed buildings representing some of the earliest development of Enfield Town. Many of the current views face west or are located close to the southern side of the gardens. We would recommend further views are considered particularly looking east and south east from the gardens and the upper section of Gentlemen's Row, showing the potential impact on the skyline over the rooftops of the listed buildings resulting from potential development of Palace Gardens and the Enfield Civic Centre. It should be noted that the viewing positions/directions given in this document will guide the scope of any visuals supporting future applications for development, so it will need to fully illustrate the potential visual impacts on heritage assets.
- 3.34 National Highways (General Comment): National Highways' response emphasises the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25.
- 3.35 Transport for London (TFL): Transport for London welcome the added reference in part 5 to major developments contributing towards cycling infrastructure through and around the placemaking area. It would be helpful to refer to contributions towards bus stops and crossings which could benefit from improvement. Although we welcome the added reference to car parking in part 9, we recommend that the wording should be amended to read: 'development should minimise the amount of car parking spaces as well as the negative impacts of car parking and servicing.'
- 3.36 Places for London – The TFL Property Company: Places for London, TFL's property development arm, welcome the Borough's inclusion of Enfield Town Station within the Enfield Town Placemaking Area. We also commend the encouragement of tall buildings in this area but recommend that Supporting Paragraph 3.20 is reworded.
- 3.37 Better Homes Enfield: Better Homes Enfield's response highlights missed opportunities for land assembly and site optimisation in the draft ELP, making it unsound and not compliant with the NPPF and London Plan. They emphasise the importance of integrating additional sites to maximise housing potential and better use of space. Specifically, they promote 10 sites in the area, some of which are included in the plan.

SP PL2: Southbury

- 3.38 National Highways: As above.

- 3.39 Transport for London (TFL): Transport for London welcome the addition of the statement: 'Contributions will also be sought to increase station capacity and to improve station access.' Gateline capacity could be increased within the existing station. However, step free access may need a wider reconfiguration of the station, and at least access to land adjacent to the station.
- 3.40 Sport England: Sport England support the strategic placemaking policy addressing enhancements to nearby open spaces including Enfield Playing Fields and St. George's Playing Fields, however there is no up-to-date evidence to support what enhancements need to take place at these playing fields to support the increase in population from the place expansion.
- 3.41 BL Logistics Investment Limited (British Land): BL Logistics Investment Limited (British Land) broadly supports the Council's Southbury Placemaking Vision and the aim for intensification within the Great Cambridge Road Industrial Estate. However, they suggest the vision should encompass the entire Great Cambridge Road Industrial Estate/ Martinbridge Trading Estate SIL/IBP and that co-location should only be promoted in exceptional circumstances within SIL. British Land supports Draft Strategic Policy PL2's aim to enhance placemaking in Southbury and safeguard the Great Cambridge Road Industrial Estate/ Martinbridge Trading Estate SIL/IBP for industrial use. They recommend that Policy PL2 should clarify that placemaking principles are intended to guide development, where practically feasible, rather than serve as strict criteria. BL Logistics Investment Limited (British Land) comments on the De Mandeville Retail Park site, noting it is not proposed for site allocation and has no policy designation under the Draft Local Plan, classifying it as "white land." Therefore, the Local Plan and Development Management policies should maintain flexibility for the site to support either land use allocation over time.
- 3.42 SEGRO: supports the general direction of Policy PL2, especially the requirement for residential proposals near Strategic Industrial Locations (SIL) not to compromise industrial operations. However, SEGRO is concerned that policies PL2 and E3 could mandate intensification and increased floorspace/job density within SIL areas, which might not always align with specific business needs or site characteristics. They emphasise the importance of flexibility in these policies, considering the diverse requirements of logistics and distribution businesses, the high costs and challenges of multi-level warehousing, and alternative measures of industrial intensification beyond just increasing floorspace.
- 3.43 Places for London – The TFL Property Company: welcome the Borough's inclusion of Enfield Town Station within the Enfield Town Placemaking Area. We also commend the encouragement of tall buildings in this area but recommend that supporting Paragraph 3.20 is reworded to incorporate the following: 'To accommodate growth, an increased number of tall buildings will be incorporated, and encouraged around railway stations in Enfield Town'. Housing delivery on station car parks provide the opportunity to reduce car-dependency and encourage the shift to sustainable travel in London, which falls in line with London Plan Policy HI and DI encouraging higher density development to be located in areas with high transport accessibility.

SP PL3: Edmonton Green

- 3.44 Environment Agency: Suggested minor amendments to strengthen the policy.
- 3.45 Historic England: Historic England welcome the text in clause 2 that requires new development to preserve key views of the Grade II* listed tube station. The policy should also ensure appropriate conservation of a highly important heritage asset through reference to significance. Suggested change: 2. ... development that preserves and enhances the significance of the station, including key views.
- 3.46 National Highways: As above

- 3.47 Transport for London: Transport for London welcome the changes made to this policy in response to TfL comments, including a reference to contributions towards public transport and positive support for car free developments in part 8. We strongly support the addition of part 8d 'to retain a bus station with improved pedestrian linkage between it, the high street and the station' and part 9 'must encourage a modal shift in the area through reduction of car parking and improvements to walking, cycling and public transport infrastructure' and the statement in part 10c that 'Any changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity.' We have provided detailed requirements for the bus station and we have agreed changes to the town centre highway links to allow local re-routing of buses.

SP PL4: Angel Edmonton

- 3.48 National Highways: As above
- 3.49 Sport England: Sport England note the vision mentions the provision of new recreation facilities including the Selby Centre's regeneration emerging into a park and sports facilities, however the Strategic Policy SP PL4 appears silent on sport and recreation facilities therefore would the policy be sufficient to achieve the vision? In addition, as noted above, Sport England considers that the vision/policy should be directed by the councils up-to-date Playing Pitch Strategy or Built Facilities Strategy.
- 3.50 Transport for London (TfL): Transport for London note and welcome changes to the placemaking vision that emphasise active travel corridors rather than new rapid transport which is unlikely to be viable within the current Local Plan timescales. Superloop route SL1 provides some of these benefits but we also need complementary measures to support its introduction, such as bus priority and improved bus infrastructure.
- 3.51 Telereal Securitised Properties GP Limited: Telereal Securitised Properties GP Limited strongly supports Draft Policy PL4's identification of Angel Edmonton as a Placemaking Plan area, emphasising the need for investment and flexibility in housing typologies. They advocate for the inclusion of their site at Sterling Way, adjacent to the railway line and Silver Street Overground Station, for residential-led redevelopment, capable of delivering 180-200 homes. They recommend the site be added to Appendix C and Draft Policy H1, aligning with the Council's housing needs and strategic vision for Angel Edmonton.

SP PL5: Meridian Water

- 3.52 Transport for London: Transport for London are pleased to see that paragraph 3.68 (page 66) includes a commitment to the masterplan approach to ensure consistency across Meridian Water, which will be required for comprehensive infrastructure and flood risk planning.
- 3.53 Environment Agency: The Environment Agency recommend that the 'Green Infrastructure' policy point is expanded to 'Green and Blue Infrastructure' to acknowledge the high number of watercourses within the site and their significance for the Meridian Water project. Further to this, we strongly recommend a standalone policy point on Flood Risk to acknowledge the complex flood risk issues at Meridian Water. We suggest that there is also a specific policy point for groundwater and land quality. We also recommend that point 8 makes a clear distinction between fluvial and surface water flood risk. EA advise the water bodies present in the vicinity of specific developments and place policies be mentioned in the site allocation documentation. We strongly recommend that the place policies which have rivers incorporate wording that encourages, and/or requires river restoration and naturalisation.
- 3.54 National Highways: As above
- 3.55 Lee Valley Regional Park Authority (LVRPA): The LVRPA notes there have been some minor amendments to Policy PL5 Meridian Water and maintains its previous support for this policy and the Placemaking vision for Meridian Water. The detailed policy guidance for this area is

welcomed in particular the amended points relating to the delivery of green corridors, public open space and the requirement for development to contribute to the naturalisation and ecological enhancement of existing waterways.

- 3.56 London Borough of Waltham Forest: London Borough Waltham Forest's (LBWF) response to PL5 Meridian Water highlights the opportunity for enhanced recreational facilities at Banbury Reservoir, emphasising the need for improved connectivity between the boroughs, as the reservoir infrastructure is in Waltham Forest and operated by Thames Water. They stress the importance of active travel connectivity for job opportunities and suggest including routes into Haringey and Waltham Forest on the map. Additionally, they recommend ensuring public routes and spaces are safe for women and girls at all times. LBWF calls for collaboration to enhance connectivity and safety measures in the Local Plan to benefit residents across boroughs. Continued cooperation between Waltham Forest and Enfield is crucial for developments within Meridian Water (PL5), including the industrial-led regeneration of Meridian East, the 'Meridian Hinterlands,' and adjacent sites. This includes Waltham Forest's consultation on industrial masterplanning as outlined in paragraph 9.88. Waltham Forest confirms, per paragraph 9.22, that it cannot accommodate industrial capacity to meet Enfield's identified need.
- 3.57 Canal & River Trust: The Canal and River Trust state that the council's Meridian West Supplementary Planning Document should be referenced within the LP. Further clarity should be provided in relation to the creation of 'canals and waterways' so that the expectations can be better understood. Canals would usually be navigable by boats, if that is the intention then detailed information on matters such as water resource, future maintenance, management, and ownership responsibilities would need to be clearly identified. Policy PL5: Part 8 - refers to naturalisation and ecological enhancements for river naturalisation. As we have stated previously, significant rewilding and /or naturalisation is highly unlikely to be achievable on the RLN, given its function as a navigable waterway. This should be caveated within the policy and clearly referenced within the supporting text for this policy. The Trust should be acknowledged as a key stakeholder in any proposals for use of the RLN for watersports. The trust note that policy should include specific reference to improving the towpath along the RLN.
- 3.58 Sport England: Sport England note there is indication of 10,000 homes to be delivered as part of this place expansion, however there is no indication of specific playing field land to be delivered or enhancements to existing playing fields in the local vicinity. With considerable growth in an area brings demand for additional sport and physical activity provision or upgrades to existing sport facilities and playing fields in the local area. Sport England would like to see specific wording around providing a designated space for playing fields to accommodate for the increase in population and backed up by council evidence.
- 3.59 Prologis for Ravenside Retail Park: Prologis supports the overall goal of Policy PL5 but raises concerns about new pedestrian, cycle, and vehicle routes potentially disrupting operational industrial and logistics sites. Prologis contends that requiring another masterplan is redundant, could delay development, and lacks clarity on responsibility. They suggest deleting the masterplan requirement from subparagraph 1 to avoid duplication and streamline the policy. Prologis contends that subparagraph 7 of Policy PL5, which requires 30% of development area as open public space, is too generic and does not account for the operational needs of industrial and logistics uses. They argue that this policy could hinder the viability of such developments and suggest it should specifically apply to residential and other suitable developments. Prologis supports the policy's aim to generate high-quality permanent jobs but finds the requirement for 25% local labour unclear and potentially onerous.
- 3.60 Meridian Water (LBE): The Meridian Water team supports the need for a bespoke placemaking policy given the scale of change at Meridian Water. However, to ensure effectiveness, they suggest minor updates for deliverability over the Plan period. They welcome further dialogue with the LPA to refine the context, placemaking vision, and

accompanying diagram. They propose changes to ensure office provision at Meridian Water (part 3) is subject to market and viability assessments at the planning application stage for deliverability. They propose changing the term 'green loop' to 'green network' (part 6) to better reflect the diversity of open space typologies and their connections and revisiting the 30% open space minimum requirement at each phase (part 7) to promote a site-wide ambition for comprehensive green infrastructure. And they propose deleting the requirement for new open spaces on either side of the A406 (part 10) and allowing future masterplanning to determine the appropriate quantum of high-quality, multifunctional open space.

- 3.61 Better Homes Enfield: Better Homes Enfield's response to policy PL5 highlights several key issues: the proposed housing numbers and site optimisation fall short of potential, there is a lack of clarity on affordable housing and housing mix, the provision of open space is inadequate, active travel needs are insufficiently addressed, employment targets and benefits for local people are unclear, and monitoring mechanisms are inadequate. They suggest revising site allocations, clearly defining housing requirements, specifying open space provisions, improving connectivity, providing detailed employment plans, enhancing monitoring with comprehensive KPIs, and clarifying the status of existing strategies. These modifications would align policy PL5 with the London Plan and national policies, ensuring it is sound and effective.
- 3.62 Enfield Climate Action Forum: The EnCaf Land Use Working Group (ELUWG) supports the regeneration of Meridian Water but argues that Policy PL5 is not legally compliant or sound, though it could be with major modifications. They emphasise that the Habitats Regulations Assessment (HRA) required by the Conservation of Habitats and Species Regulations 2017 has inadequately assessed the potential impact of the increased housing numbers proposed for PL5 on nearby protected sites, such as the Epping Forest Special Area of Conservation (SAC). The HRA was based on an outdated housing number (5,658 homes) instead of the current projection (6,711 to 10,000 homes) and did not adequately consider the adequacy of new open spaces. Additionally, the ELUWG argues that PL5 does not meet the National Planning Policy Framework (NPPF) requirements for sustainable development, as it lacks sufficient provision for green infrastructure and fails to address the substantial local deficit in open space. They highlight that the proposed new park, Edmonton Marshes, is insufficient in size and quality relative to the needs of the expected population. ELUWG also questions PL5's compliance with the London Plan, which mandates appropriate planning for future open space needs in areas of substantial change. They recommend modifications to ensure that PL5 aligns with national and regional policies, and adequately addresses green space needs.

SP PL6: Southgate

- 3.63 Historic England: Historic England welcome the text in clause 2 that requires new development to preserve key views of the Grade II* listed tube station. The policy should also ensure appropriate conservation of a highly important heritage asset through reference to significance. Views need to be considered from the terrace outside the café within the Grade II* Registered Park and Garden of Grovelands Park. This raised area affords significant views looking west over the park and of the Grade I listed Nash villa. These views are an integral part of the significance of both heritage assets. We would be likely to object to any development that appears in those views.:
- 3.64 National Highways: As above
- 3.65 Transport for London (TfL): Transport for London welcome the changes made in response to TfL's comments including the addition to part 7 of a reference to cycling infrastructure and the statement that 'Development proposals and changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity.' We also strongly welcome the amended statement in part 8 that development proposals 'must contribute towards enhancing the pedestrian environment and reduce the reliance on surface car parks, working towards car-free development.'

- 3.66 London Borough of Barnet: LB Barnet Notes that Policy PL6 recognises the importance of Southgate Town Centre, a significant part of whose catchment lies within LB Barnet. LB Barnet supports the town centre's renewal but stresses the need to consider the impact on the character of the adjacent low-rise suburban housing, much of which is in Barnet. They emphasise that the form and siting of tall buildings should be a significant consideration, a point not clarified in Policy PL6 of the Reg 19 draft Local Plan. Policy PL6 mentions exploring the need for a coordinating plan, possibly as a Supplementary Planning Document (SPD), to support Southgate's placemaking vision. While Barnet welcomes this approach, they recommend adding a requirement that neighbouring areas within LB Barnet and LB Enfield be considered in terms of design impact and town centre catchment, to support the town centre hierarchy identified in the London Plan.
- 3.67 Asda Stores Ltd: Savills, on behalf of Asda, supports the Placemaking Vision for Southgate as a thriving District Centre and the specific policy for Southgate, including the identification of Asda's store within the District Centre boundary. They recommend clarifying the placemaking diagram to avoid ambiguity. While supporting enhancements to the pedestrian environment and reducing surface car parks, Savills emphasises the need for appropriate vehicular parking for food shopping. They also suggest amending Strategic Policy TC2 to include "where appropriate to do so" for Criteria 2 requirements, acknowledging that minor developments might not contribute to all policy matters. Additionally, Asda welcomes engaging with the Council on a future SPD to support the placemaking vision.
- 3.68 The Enfield Conservative Group: The Councillor for Southgate Ward highlights a contradiction in the Plan, which suggests removing office space at Southgate Office Village to create more homes, while simultaneously advocating for increased office space and commercial units in Southgate for a night time economy. They noted that this inconsistency has fuelled ongoing resident opposition and remains a contentious issue despite the planning application's prior approval. The Councillor for Southgate Ward expressed concerns that the plan allows buildings up to 30 meters high, which contrasts sharply with Southgate's existing low-density, low-rise houses. They emphasised that this would drastically alter the skyline and overall image of Southgate, negatively impacting views and the setting of the historic Charles Holden-designed station. The Councillor for Southgate Ward noted that the Local Plan's emphasis on prioritising active travel and car-free development has sparked outrage among residents. They highlighted particular concerns from disabled residents about the challenges this poses to their mobility and ability to navigate the borough.
- 3.69 Residents/Businesses: A small number of residents objected to the proposed maximum building heights in the placemaking area stating these would not be in keeping with the existing character.

SP PL7: New Southgate

- 3.70 Environment Agency: The Environment Agency advise that the water bodies present in the vicinity of specific developments and place policies be mentioned in the site allocation documentation. We strongly recommend that the place policies which have rivers incorporate wording that encourages, and/or requires river restoration and naturalisation (PL3, PL4, PL5, PL7, PL8, PL9, PL10 and PL11).
- 3.71 Historic England: Historic England state that the projection of new development over the rooftop silhouette of the former Friern Hospital is considered harmful to its architectural significance and setting. This is a well composed expansive and symmetrical composition. Details can be found at: <https://historicengland.org.uk/listing/the-list/list-entry/1078848>.
- 3.72 London Borough of Barnet: LB Barnet note that the Main Modifications to their own draft Local Plan do not identify New Southgate as an area for tall buildings due to insufficient supporting evidence. LB Barnet will continue collaborating with LB Enfield to ensure a comprehensive, master-planned approach to New Southgate, aligning with Barnet's Policy GSS09. The

Statement of Common Ground indicates both Barnet and Enfield support and promote this potential. This is reflected in Enfield's draft policy T1, which states that new development will safeguard land and buildings to facilitate active travel, public transport, and future infrastructure projects, including Crossrail 2. Additionally, Policy PL7 envisions New Southgate as an enhanced gateway with improved connections to Enfield and neighbouring boroughs, a development welcomed by LB Barnet.

- 3.73 National Highways: As above
- 3.74 Residents/Businesses: Residents object to the development of tall buildings based on outdated housing need figures derived from 2014 population projections, which are significantly overstated compared to the latest 2021 census data and projections for Enfield. The actual population has decreased in recent years, and the GLA's projections show an increase of only about 10,000 people from 2021 to 2041, versus the 51,000 stated in the ELP. This overestimation leads to an inflated housing need figure of around 34,000 homes. Residents argue that using more relevant and recent data would provide a more accurate housing need figure, potentially negating the necessity for tall buildings and high-density housing. They also express concerns that proposed tall buildings around Southgate Circus, with heights up to 30 meters, are unsympathetic to the area's character and will impact privacy by overlooking gardens, thus negatively changing the area's character.

SP PL8: Palmers Green

- 3.75 Environment Agency: The Environment Agency advise the water bodies present in the vicinity of specific developments and place policies be mentioned in the site allocation documentation. We strongly recommend that the place policies which have rivers incorporate wording that encourages, and/or requires river restoration and naturalisation (PL3, PL4, PL5, PL7, PL8, PL9, PL10 and PL11).
- 3.76 Historic England: Historic England suggest that the policy should include an objective relating to the removal of Broomfield Park from the Heritage at Risk register to ensure consistency with policies elsewhere (e.g. Policy PL3 Edmonton Green). Suggested change: Amendment to ensure consistency with PL3.
- 3.77 National Highways: As above
- 3.78 NHS London Healthy Urban Development Unit: The NHS London Healthy Urban Development Unit supports additional housing in Palmers Green, noting that development is expected within 5-10 years. They suggest including an additional point on the need to contribute to health provision to emphasise the importance of health and wellbeing.
- 3.79 Transport for London (TFL): TFL welcome part 7 which states that development proposals 'should contribute towards improving and enhancing cycling and pedestrian accessibility to support sustainable travel patterns.

SP PL9: Rural Enfield

- 3.80 Historic England: Historic England state that it is clear that intensification of use of green space will follow from the proposed development, including that of Trent Park, which is both a conservation area and a registered park and garden. Contributions towards a management plan for the park should be required so that this increased use can be planned for and mitigated. Suggested change: Include requirement that development proposals make contributions towards conservation area/registered park and garden management plan.
- 3.81 Lee Valley Regional Park Authority (LVRPA): The Park Authority recommends amendments to Policy PL9 Rural Enfield to further recognise the statutory role of the park authority and its Park Development Framework Area Proposals which form part of the Local Plan. To be considered sound i.e. positively prepared and justified a policy statement in support of the

Regional Park and the Park Development Framework should be included in the Local Plan. Riparian authorities such as Enfield are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)). The Authority has adopted detailed proposals for those areas of the Regional Park which lie within the London Borough of Enfield through the Park Development Framework Area Proposals. Two sets of Area Proposals are relevant given the extent of Park in the borough: Area 4 The Waterlands: Banbury Reservoir to Pickett's Lock, and Area 5 The Waterlands: King George V Reservoir to Rammey Marsh.

- 3.82 NHS London Healthy Urban Development Unit: The NHS London Healthy Urban Development Unit supports the emphasis in Policy PL9 on landscape restoration, active travel initiatives, climate resilience initiatives, food growing areas and gardens, eco-tourism and leisure activities, and biodiversity offsetting.
- 3.83 Canal and River Trust: Para 3 states that 'Projects which solely provide for habitat creation, biodiversity net gain, carbon sequestration or other forms of environmental benefit, particularly those which can be sold on, will be resisted unless there are demonstrable local public benefits.' The reasoning for this is not clear. There does not seem to be any detailed guidance as to what would be considered a local public benefit and there may be the potential for conflict with other policies and aspirations within the LP.
- 3.84 Sport England: Sport England would like to see the improvement of sports excellence at Tottenham Hotspurs training ground to be backed up by evidence. There is no mention of this in the 2018 PPS or the Blue and Green Strategy, and therefore Sport England have to question if this is the most appropriate location to invest in enhancements. What is the strategic assessment of this grounds and what sports will be accommodated for the community. This again raises questions on what evidence for sport and physical activity has informed the Local Plan and the requirement for a sports facility in location would be difficult to justify without it being strategically identified as required to meet existing or future local sporting needs in an up-to-date PPS or BFS.
- 3.85 Enfield Society: The policy wording of PL9 is bold and ambitious but lacks detail and is not supported by evidence base work that could illustrate what, where and how the changes would be delivered. The policy could blur the distinction between rural and urban areas, contrary to NPPF Paragraph 180. The approach is inconsistent with national policy and the London Plan. Enfield Society members, who have contributed to the Enfield Chase Landscape Restoration project, are concerned that their work might justify the loss of important parts of Enfield Chase through compensatory improvements to areas of remaining Green Belt. The policy aims to improve public access to the rural area but is tied to unsound developments in the Green Belt. Biodiversity offsetting is not appropriate for the proposed developments at Chase Park and Crews Hill. The designated SINC at Crews Hill Golf Course is characterised by a large area of acid grassland habitat, which is rare and unique. The Vicarage Farm and Rifle Site SINC at Chase Park forms part of a strategic network protected by paragraph 185 of the NPPF. Biodiversity offsetting is not appropriate for established ecological networks. The proposed transformation of Enfield Chase, from a mixed agricultural landscape to woodland, meadows, and wetlands, conflicts with national policies for the historic environment and the London Plan policy HC1. The principles behind the policy are not evidenced and conflict with the landscape values identified in the Enfield Characterisation Study. Old Park, protected by Metropolitan Open Land designation, is critical to understanding a range of heritage assets in the area.
- 3.86 Enfield Road Watch: Enfield Road Watch contend that Policy PL9 should be deleted from the Local Plan. Of major concern is that the vision depends on S106 funding from developments elsewhere in Enfield's Green Belt, although this is not made clear in Policy PL9. They suggest the policy is misleading and contradictory, and there are elements that are not appropriate, for example connecting the Lee Valley Regional Park and Enfield Chase with

one policy. They suggest that to imagine that Enfield Chase could become a multi-activity, high-volume destination with the car parking and other amenities that would be required is totally inappropriate in the context of the historic Enfield Chase landscape. The 'new cultural gateway' referred to paragraph 2b would inevitably be car-dependent, needing a large car park, and seems over-ambitious in its scope for the setting.

SP PL10: Chase Park

- 3.87 Greater London Authority (GLA): The GLA has significant concerns about the ability of Crews Hill and Chase Park to deliver sustainable neighbourhoods that are not car dependent. The GLA emphasises the need for a robust, masterplanned, and phased implementation strategy to ensure upfront provision of infrastructure and public transport services. Additionally, a realistic funding strategy is crucial to support this delivery and optimise land use.
- 3.88 National Highways: National Highways must ensure traffic impacts are mitigated, and a Transport Assessment (TA) is required for significant housing sites near M25 and SRN junctions. The plan emphasises the importance of sustainable infrastructure and development in the right places, as walking times between new homes and amenities can exceed 30 minutes, reinforcing car dependency. National Highways are supportive that PL10 to PL11 promote active travel and integration into the transport realm.
- 3.89 Transport for London (TfL): Concerns raised regarding the lack of detail on transport proposals and recommends car parking be limited. Concerns regarding the lack of costed and agreed infrastructure, concerns work undertaken to date significantly underestimates the costs of providing new bus services. Further detail regarding trip generation and mode share required. Not convinced in regard to the 75% mode share target or limited parking, evidence required. TfL concludes there is 'no clear' way all housing and facilities will be 400 metres of the bus network as proposed. Concerns transport improvements/upgrades will still result in a low PTAL for urban development. Concerns regarding the likely 225 additional new vehicles, increasing traffic and congestion during peak times. Lack of confidence regarding costs of the Placemaking Area and lack of comprehensive coordination of the site.
- 3.90 Historic England: The proposed development, including Trent Park, will intensify green space use, necessitating contributions to a park management plan to plan and mitigate this increased use.
- 3.91 NHS London Healthy Urban Development Unit: The NHS HUDU urges the Council to make provision for changing needs and health priorities and demands over time in the placemaking area.
- 3.92 Hertfordshire County Council (HCC): HCC Ecology state Chase Park (Salmon Brook), requires drainage restrictions, greenfield discharge rates, and should avoid river and flood zone capacity reductions. HCC acknowledges the proposed SuDS scheme and brook restoration project, recommending early engagement with developers. HCC also raised concerns based on uncertainty surrounding the ecological and highways impacts on HCC. In regard to Chase Park HCC has raised concerns about increased vehicular trips into Hertfordshire due to the local plan growth, potentially resulting in unsuitable routes, such as Wagon Road, Dancers Hill Road, and Baker Street. HCC is open to discussing strategies to mitigate traffic on strategic routes. The Minerals Planning Authority has no concerns. Education and Early Years are reassured about provisions at proposed sites at Chase Park, but HCC expects Enfield to meet its own educational needs.
- 3.93 Comer Homes Group: Comer Homes supports Chase Park's allocation, particularly for family homes, and appreciates the proactive approach towards housing land supply in the Local Plan. Concerns were raised about designating Vicarage Farm as open space and proposed woodland, the road link to Hadley Road's impact on viability, and the proposal maps showing all of Comer Homes site within the Ancient Woodland designation. There were also concerns about potentially unnecessary 'expensive' infrastructure like bus routes, and the policy's

ambiguity regarding employment and the need for clarity on flexible workspaces for small businesses. The policy's contradictory requirements on building heights in relation to the area's topography and public transport corridors were noted. Issues were raised about designating Vicarage Farm as open space given its status as a working farm, restrictive wording preventing appropriate development, and the impracticality of extending Trent Country Park. The site's access via a rural footpath was acknowledged, but the open space designation within the spatial framework was deemed impractical. While 20% BNG is ideal, Comer Homes stated it is too early to determine its feasibility. The proposed new 3FE primary school near the local centre is supported but should be reviewed due to declining birth rates. Concerns were raised about the provision of playing fields in public open space at 16b due to safeguarding issues, and the need for PL10 to reference that viability will shape development. The costs associated with the site are currently unknown and infrastructure including a bus route, affordable housing will impact viability. Comer Homes believes Chase Park is deliverable but reserves position on viability until infrastructure is costed. They recommend a more flexible approach to obtaining contributions and are motivated to resolve concerns collaboratively with the council.

- 3.94 Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2: The flexible approach towards housing delivery within and beyond the plan period is supported in principle, however concerns were raised regarding the placemaking diagram as it fails to set out how the links between the Ridgeway and the main CPPA will be delivered. The consortium is supportive in principle of this approach but the Local Plan should provide more detail regarding the links. The representation recommends an additional 100 dwellings on the southern part of the allocation to the west of Arnold House based on exceptional circumstances existing and page 50 of the Local Plan. Land west of Arnold House "infill site" could be enhanced for ecological and community recreational purposes. Nicholas Holdings also expressed concerns Policy PL10 fails to meet sustainability requirements in the NPPF and have provided a concept layout which demonstrates how 100 additional dwellings can be delivered sustainability.
- 3.95 Fairview New Homes: Fairview supports the Local Plan and the allocation of Chase Park for development. They state there are no significant infrastructure or environmental barriers that could delay the project. Fairview, an experienced house builder, plans to deliver a mix of flatted and family homes, facilitating a quick response to local housing demands. The development is expected to help meet the Borough's housing needs and protect valued landscapes in the area. Fairview supports the council's proactive approach to meeting housing needs but requests more information on the housing target and further clarity. The comments support the Vision for Chase Park and the overall intent of Policy PL10 to create a sustainable new neighbourhood with a focus on green infrastructure. However, they suggest several clarifications to enhance the policy's clarity and effectiveness. They note that the current masterplanning framework should not be seen as a strict blueprint but rather as a guiding framework. They recommend rewording Figure 3.2 to emphasise its illustrative nature and inserting a paragraph to clarify this. They also recommend clarifications to figure 3.12, request more flexibility in terms of the site's capacity, and concerns around the prescriptive nature of the some of the requirements. They also suggest lowering the 20% net gain target to 10%, have concerns around the 50% viability requirement and suggest more flexibility is required, and address concerns around the flexibility of the housing mix policy, and propose various other amendments and clarifications. Overall, the aim is to ensure that the policy is sound and effectively facilitates future planning applications while addressing the need for a comprehensive approach to development.
- 3.96 London Diocese Fund: Overall, the Fund is supportive of Chase Park Placemaking Area and the vision it sets out. They note that sites within the allocation can come forward independently of each other. The IDP should come forward as part of the Local Plan, and the Fund would have concerns if an SPD or IDP were delayed until after Local Plan adoption, leading to delays in delivering homes. They expressed general concerns that the production of an SPD will delay delivery. The framework plan identifies the client's site as Borough

SINC, Flood Zone 2 and 3, public open space, and a Green Link however some of the site will provide supporting development.

- 3.97 Capel Manor College: The College land is small but provides an important linkage to The Ridgeway. Concerns regarding the placemaking area diagram as it may hinder the preparation of a detailed comprehensive plan for the placemaking area.
- 3.98 Daisy Walker (200 Enfield Road): Concerns regarding PL10 and SA10.1 boundaries, the scheme appears isolated and not making best use of Green Belt release land. Advises it does not optimise the potential of the site as the site capable of delivering more homes, and the inclusion of the subject site (200 Enfield Road) would allow better quality placemaking.
- 3.99 CPRE London: CPRE London opposes the development of Green Belt land at Chase Park (PL10), highlighting that it fulfils all Green Belt purposes and is inappropriate for development. They argue that Enfield has sufficient brownfield land and existing major sites like Meridian Water that should be developed first. CPRE emphasises that Enfield Chase is a beautiful and historic landscape, and development would significantly harm the area's character and identity. Additionally, the popular Merryhills Public Right of Way and countryside views from local footpaths would be ruined by urbanisation.
- 3.100 Trent Park Residents Association: The Trent Park Residents Association objects to the proposed developments at Vicarage Farm and the Trent Park Equestrian Centre on legal compliance grounds, arguing they are not 'sound' or in conformity with the London Plan and should be removed from the Local Plan. The objections include concerns that the developments would harm the historic setting of Enfield's Green Belt, disrupt key entrance points, strategic views, and the rural backdrop, damage the visual connection between Trent Park and the former Enfield Chase, urbanise popular pedestrian gateways, and encourage more car use due to poor public transport connectivity. Additionally, the developments would harm the tranquillity of areas like Williams Wood, negatively impact the Metropolitan Site of Importance for Nature Conservation, and result in the loss of the Trent Park Equestrian Centre, which holds historical and mental health value.
- 3.101 Friends of Trent Country Park: The Residents Group argues that the proposed developments at Vicarage Farm and Trent Park Equestrian Centre don't conform to the London Plan, disrupting the relationship between Trent Country Park and Vicarage Farm. They criticise the Trent Park Conservation Area Character Appraisal (CAA) for not considering the wider landscape setting and oppose further development due to potential harm to the area's character. Concerns are raised about the impact of the placemaking area on the Site of Importance for Nature Conservation (SINC), including school playing fields and the proposed heritage park and road leading to increased footfall. They critique Tyler Grange's report for not considering the SINC within Vicarage Farm's wider ecological network and argue that biodiversity net gain doesn't accurately measure the site's value in terms of strategic habitats linkages. The proposed extension of the Country Park and new open spaces wouldn't mitigate the impact on the Vicarage Farm SINC or compensate for the loss of the Merryhills Brook Valley's open countryside. They believe the approach doesn't conform to London Plan Policy G6B (1) as it would impact open space which is defined in the London Plan as undeveloped land even where it is inaccessible to the public, and that the proposals for Chase Park would result in the loss of the high-quality countryside experience.
- 3.102 Enfield Road Watch: Enfield Road Watch criticises the proposed development for being contrary to the London Plan's urban growth focus and causing harm to the valuable countryside without considering alternative locations. The development lacks community support and is opposed due to its severe impact on the area's character. The proposed 'urban' density is seen as inappropriate for a rural location and not in compliance with paragraph 130 of the framework, and the figure of 3,700 homes not justified. The Transport Strategy 2024 is deemed ineffective in delivering an LTN 1/20 and London Plan compliant transport network. The response questions the deliverability of the proposals, peak trips and

delays and their impact on busses, the overall modal assumptions and shift, the transport modelling outputs and suggests this need scrutiny at examination. Furthermore, in the absence of a commitment from the NHS proposals for health facilities are not likely to be effective. It is unlikely that the entirety of new secondary school needs could be provided at local schools, leading to a substantial number of school trips towards a new secondary school at Crews Hill. The ecological appraisal commissioned by Enfield Road Watch from the chartered ecologist Dennis Vickers indicates that the use of Vicarage Farm and Rifles site SINC as open space would degrade the designated habitat.

- 3.103 Enfield Society: The Enfield Society opposes the proposed development at Vicarage Farm, citing its historical and landscape significance to Enfield Chase and Trent Park meaning it would not be in conformity with London Plan Policy HC1. They argue the development's density, providing 3,700 homes, disrupts the area's character and therefore would not be in accordance with paragraph 130 of the framework. They also express concerns about the impact on the Archaeological Priority Area at Hog Hill and have commissioned a report from consultant Dr Philip Masters of Actaland Ltd to support their claim that the area is a valued landscape as defined by the framework. The creation of a new Green Belt boundary and an extension to Trent Country Park, blurs the distinction between Green Belt and non-Green Belt areas. They question the 'Whole Plan Viability Review' justifying 50% affordable homes highlight suggested discrepancies in the evidence base on family housing in the LHNA, topic paper and local plan and note the Council's evidence predicts fewer children and more older residents, suggesting a shift from family housing to 2-bedroom properties for downsizers. They note that the majority of new family housing in London is already delivered through apartments with communal spaces rather than houses. They suggest Gypsy and Traveller Accommodation needs could be met on Council-owned land without releasing Green Belt. They criticise the proposal to surround the Site of Importance for Nature Conservation (SINC) with development and the creation of a new Green Belt boundary. They note the development's completion after 2041 would delay the Country Park's use until the late 2040s or 2050s and could cause severe traffic congestion. They argue that the proposed bus and cycle routes are impracticable due to topographical constraints and distances to bus stops, making the target of 75% sustainable mode share unachievable.
- 3.104 Enfield Archaeological Society: Residents in the Society express concerns regarding legal compliance, specifically the clarity of the term "Heritage Asset" in Policies DE4 and DE10. While the incorporation of Historic England's 2019 recommendations is acknowledged, residents urge that the definition in the 'Acronym Buster and Glossary' explicitly include both built and buried heritage resources. For Chase Park (section PL10), residents are worried about the lack of consideration for the likely multi-period buried archaeological resources in the development area, particularly prehistoric archaeology evidenced in other parts of Enfield Chase. They recommend that the Masterplan include a comprehensive archaeological assessment based on fieldwork. Additionally, while welcoming the proposal to create a heritage park at the former Slades Hill army camp and AA gun site, they stress the necessity of full archaeological documentation and possible excavation prior to development for effective site interpretation.
- 3.105 North West London RSPB: The local branch of the Royal Society for the Protection of Birds opposes the proposed development of Vicarage Farm/Trent Park Equestrian Centre and other Green Belt areas in Enfield, arguing it would damage significant natural countryside and adjoining Sites of Importance for Nature Conservation (SINCs), not conforming to London Plan Policy G6. Vicarage Farm, a refuge for many bird species, is particularly important for seasonal migrants and hosts locally scarce Skylark and Swallow colonies, as well as breeding Hobby Falcons. The farm is a vital community resource, promoting health and wellbeing, and is ecologically significant due to its biodiversity. The group warns that the loss of undisturbed natural habitat would harm sensitive wildlife. An Ecology Habitat Survey of Glebe Fields, contiguous with Vicarage Farm, reveals the site's ecological importance. The development could isolate Boxer's Lake SINC and disrupt the Wildlife Corridor linking suburban Oakwood/Enfield with Vicarage Farm. The fields play a role in surface water management

and provide a rural setting in the Protected Green Belt. The development could lead to the loss of public amenity, panoramic views, and the area's unique rural character. The group argues that Enfield Council has a legal responsibility to preserve and enhance biodiversity and that the region's overall ecology would be substantially diminished if the farm succumbs to development. They believe the whole farm would merit SINC status if the ornithological characteristics were fully recognised, emphasising that SINC status is afforded a high level of protection within the planning system although non-statutory.

- 3.106 **Bush Hill Park Residents Association:** The Residents Association state that section of Green Belt to be removed for Chase Park is currently designated as the Enfield Chase Area of Special Character within the current statutory Development Plan. Removal of this piece of Green Belt thus goes against the current Development Plan and should therefore be removed from the proposed ELP. The area proposed for development is part of a unique landscape in London: an historic Royal Chase. Though research it has been established as a special area which, despite modern encroachment, has largely survived. This importance of this area was highlighted by Historic England in their Regulation-18 response. They raise concerns 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". It is not clear that any new assessment has been carried out in the interim. Vicarage Farm forms a rural barrier between Enfield and Oakwood. The proposals would harm the identity of this barrier by creating an urban continuum between these areas with on-street development.

- 3.107 **Barnet Society:** The Society's objection on principle to erosion of the Green Belt and would take particular exception to any loss of the green buffer that exists between the London boroughs of Enfield and Barnet, especially north and south of Hadley Road and Enfield Road. They state that these attractive stretches of countryside are vital to preserving the separate identities of Barnet, Hadley, Cockfosters, Enfield Town and other settlements that would otherwise have merged into amorphous suburbia.

- 3.108 **Residents/Businesses:** Many residents object to the placemaking area and Policy PL10, citing concerns about developing Green Belt land in Chase Park, Vicarage Farm, and Trent Park Equestrian Centre. They argue the plan will lead to urban sprawl, loss of countryside feel and special semi-rural character, and strain on already busy roads due to increased car journeys. They express concerns about the impact on wildlife, loss of historical landscape, increased car dependency, and non-compliance with London Plan policies. They argue that the proposed development will exacerbate traffic congestion, strain existing infrastructure, increase flood risks, overcrowd schools, and increase air pollution. They recognise the need for more housing in Enfield but argue there are sufficient non-Green Belt areas for development, citing the 2019 Enfield Society report "Space to Build". They oppose the construction of 5-storey blocks with shops, citing potential car dominance, negative impact on local jobs, and unsuitability of the proposed road layout and steep slopes in the area for walking, cycling, and disabled access. They express dissatisfaction with the overall development strategy for Enfield and argue that building on untouched Green Belt land will alter its character, disrupt wildlife habitats, and increase car dependency due to inadequate public transport and state that the added traffic will exacerbate congestion and pose risks to children traveling to nearby schools.

PL11 Crews Hill

- 3.109 **Greater London Authority (GLA):** The GLA has significant concerns about the ability of Crews Hill and Chase Park to deliver sustainable neighbourhoods that are not car-dependent. The GLA emphasises the need for a robust, masterplanned, and phased implementation strategy to ensure upfront provision of infrastructure and public transport services. Additionally, a realistic funding strategy is crucial to support this delivery and optimise land use. The GLA expresses concerns that the high cost of providing transport infrastructure and services for

new, isolated settlements may not be realistic or viable. This could result in car-dependent areas with poor access to essential services and increased pressure on the road network.

- 3.110 Transport for London (TfL): TfL raised concerns regarding the lack of detail on transport proposals. Recommends car parking to be limited. Concerns regarding the lack of costed and agreed infrastructure, concerns work undertaken to date significantly underestimates the costs of providing new bus services. Further detail regarding trip generation and mode share required. Concerns transport improvements/upgrades will still result in a low PTAL for urban development. TfL concludes there is 'no clear' way all housing and facilities will be 400 metres of the bus network as proposed. Provision of a bus service at CH is not viable. Concerns there is no policy reference to 75% mode share target or limited parking. Concerns regarding the likely 550 additional new vehicles, increasing traffic and congestion during peak times. Lack of confidence regarding costs of the Placemaking Area and comprehensive coordination of the site.
- 3.111 National Highways: National Highways must ensure traffic impacts are mitigated, and a Transport Assessment (TA) is required for significant housing sites near M25 and SRN junctions. The plan emphasises the importance of sustainable infrastructure and development in the right places, as walking times between new homes and amenities can exceed 30 minutes, reinforcing car dependency. National Highways are supportive that PL10 to PL11 promote active travel and integration into the transport realm.
- 3.112 Hertfordshire County Council (HCC): HCC Ecology stated that Crews Hill could reduce semi-natural habitats south of the M25, affecting the existing mixed land use of agriculture, development, and leisure. Although the development may degrade some ecological characteristics, it could enhance others and enhance their value. The extent of BNG for HCC benefits depends on landowner availability and potential impacts on local population pressure, industrial and leisure activities, and wider countryside resources. Currently unknown outcomes/impacts. HCC has raised concerns about the increase in vehicular trips into Hertfordshire due to the growth at Chase Park and Crews Hill. HCC is open to discussions on this matter. Concerns that Crews Hill development may need to mitigate traffic volumes along Cattlegate Road and onto settlements like Potters Bar, Cuffley, and Goffs Oak. Crews Hill placemaking area, could potentially impact Hertfordshire due to its proximity. The Minerals Planning Authority has no concerns. The borough council should be aware of the nearby Waste Management Site, Cattlegate Farm, which is safeguarded under Policy 5 of the Waste Core Strategy and Development Management Policies document. Education and Early Years are reassured about provisions at proposed sites at Crews Hill, but HCC expects Enfield to meet its own needs.
- 3.113 Welwyn Hatfield Borough Council (WHBC): WHBC raised concerns regarding the level of harm to the Green Belt and narrowing the gap between the settlement at Cuffley and London. The response highlights it is essential for Enfield to continuously update their Infrastructure Delivery Plan to address infrastructure implications as they emerge. Essential for Enfield to engage with neighbouring LPAs and Highways. Concerns regarding proximity of Crews Hill to WHBC, particularly highway and transport impacts.
- 3.114 NHS London Healthy Urban Development Unit: HUDU urges that the Council makes provision for changing needs and health priorities and demands over time.
- 3.115 Berkeley Homes (North East London) Ltd: Berkeley supports the policies overall identification of Crews Hill, in regard to SA11.2 aspects of the policy need modification for soundness, potential to provide compensatory BNG and relocate the Golf Course outside the allocation within the retained GB. This could be approached by using an SPD framework masterplan or equivalent and as such should be referenced in the policy. Furthermore, the capacity of SA11.2 should be increased to 350 homes. Supportive of Crews Hill and policy, to support growth in line with national and Enfield's ambitions. Need for a detailed comprehensive, coordinated masterplan process via an SPD or subsequent planning mechanism for the

placemaking area without being too onerous. Supportive of a parcel-based approach underpinned by an overarching masterplan to allow unconstrained parcels to be delivered. Berkeley keen to deliver homes and work collaboratively with the Council.

- 3.116 LBE Strategic Property: LBE Property states the Local Plan should not limit development to a maximum of 5,500 homes at Chase Park as the detailed design is yet to commence, supporting infrastructure is not fully confirmed, and there are mixed landowners within the area. They highlight the role of LBE owned sites in delivery and request a flexible approach to detailed masterplanning and the need for relocation sites. They highlight a lack of information on phasing in the evidence base and state that phasing should be based on up-to-date surveys and mitigation measures for any unavoidable loss of habitat. They note the Council plans to address SINC designations through landscape-led design and mitigation measures, and although the SINC Report recommends upgrading the SINC to a Metropolitan SINC, they do not consider this to meet the Crews Hill Placemaking Area objectives. They state the area should be split into phased parcels in the masterplan, with Phase 1 sites such as Crews Hill Golf Course, Kings Oak Equestrian Centre, and Sunbeam Stud to be developed within the plan period. They make a number of representations as to the capacity of individual sites in their ownership, stating these are logical and sustainable locations for future development which can be phased early in the plan period, and that increases in capacity on key sites could improve the viability position. They urge the council to consider sites in the placemaking area not currently allocated for development but instead designated as white land. They note the Golf Course Needs Assessment report concludes that if Crews Hill Golf Club were to be lost for redevelopment, there are sufficient alternative golf courses in the area. They state that the viability Assessment needs updating following the Regulation 19 consultation, including development and infrastructure costs and note final viability position is yet to be confirmed, with additional details required for the Local Plan examination. They assert the SPD requirement should prioritise activities related to phasing development, infrastructure costs, and scheme viability, but note that the evidence base for Crews Hill is already sufficient to begin parcel level masterplanning work, subject to a review of allocated land uses and input from Enfield's Design Review Panel on design codes for the placemaking area.
- 3.117 Leonard F Jollye (Brookmans Park): The Landowner is supportive of Crews Hill to deliver a sustainable development which meets the housing needs of the borough including affordable housing. Concerns regarding the 20% BNG proposed within the Local Plan policy, as National guidance now states that plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain unless justified, including local need, opportunities, and impacts on viability. The council has not justified its reasoning for the 20%.
- 3.118 Taylor Wimpey: Taylor Wimpey note the SPD should be adopted during the Local Plan process, concerns there is no certainty in regard to timescales. Concerns if the IDP and SPD are delayed post plan adoption it will delay housing delivery at Crews Hill.
- 3.119 Rockwell London Ltd for Kings Oak: Rockwell are supportive and advise many sites including Kings Oak could be delivered now, whilst acknowledging the complex ownership in the area and need for a wider masterplan. They also however express concerns about the Local Plan's approach to masterplanning, coordination, and impacts on viability. They question the viability of the £50k per dwelling s106 contributions and 50% affordable housing, considering it 'borderline viable/un-viable'. They suggest more accurate evidence is needed and negotiations to reduce contributions and affordable housing. They advise LBE to engage with owners on viability testing and propose 40% affordable housing. They identify that the viability work undertaken identifies conservative assumptions in the market position, such as no separate allowance for site-wide infrastructure, a developer profit of 15% of market GDV, and a low profit of 17.5%, and note the potential for the position to worsen based on market dynamics. They express concerns about the requirement for an SPD prior to permission being granted, Local Plan adoption timescales, and SPD preparation delaying delivery, and object to the use of an SPD post local plan adoption due to concerns of lead-in times and delivery. Despite these objections, Rockwell aims to deliver homes within the first 5 years of

the plan period, subject to an agreement with Enfield Estates. They and Landvest aim to deliver 1,000 homes within the plan period. They worry an SPD will deviate into matters that should be addressed within the DPD and increase financial burden on development, particularly the impact of off-site infrastructure. They suggest minor amendments to avoid potential conflict in regard to applications and policy requirements. They note the lack of detail within the policies presents a risk that each individual application may be refused due to under-delivery of family homes to meet the overall site figures. They seek clarity on which existing rural uses will be 're-provided' and assume that the re-provision will not apply to the Equestrian Centre.

- 3.120 Thompsons of Crews Hill Ltd: Thompsons of Crews Hill as landowner is not promoting their land for development. The Plan is not in accordance with para 145 of the NPPF, the plan is unsound because the Council has not properly explored housing growth in urban areas and on brownfield land. The Plan is not in accordance with Policy D3 of the London Plan in that the Council has not sought to maximise the capacity on urban / brownfield sites. This is clear because of inconsistencies in the evidence base. The Policy is not clearly written and unambiguous.
- 3.121 The Ray Franklin Will Trust object to the level of engagement regarding the development of land in their ownership. The Plan is contrary to the NPPF in that it includes an illustrative spatial framework and the NPPF requires policies to be clearly written and unambiguous. Burnt Farm Ride will require extensive works to upgrade it to standard which will require the removal of hedgerows, ponds and other habitats. The illustrative masterplan shows large parts of their land as 'white' whereas they are previously developed and are suitable for development. An ecological survey has been commissioned by the landowner and submitted with the representation shows that most of the site has medium to low ecological value and is suitable for development. The Council has not fully explored the necessary equalisation to enable development to proceed.
- 3.122 Brookbank Stables: Confirmation that the landowners are working together with other landowners and that the site is suitable for development.
- 3.123 Warmerden & Co (Crews Hill) Ltd: Concern that the policy requirement of 20% BNG is not based on evidence and suggest the Whole Plan viability Study used a figure of 10%.
- 3.124 Crews Hill Golf Club: The Golf Club note that the area allocated for development is a SINC which has not been considered and would not be in conformity with the Enfield Biodiversity Action Plan. The number of homes proposed is a small proportion of the overall number but would impact on the golf club, its members, its staff and visitors to the site. The site should be listed as a local heritage asset. The cost of infrastructure improvements will be large. The proposal is not in conformity with the London Plan on Brownfield sites or the NPPF in relation to greenbelt. There is no rail capacity to serve the proposal.
- 3.125 Enfield Road Watch: Enfield Road Watch argues that the proposed development contradicts the London Plan's policies, which aim to concentrate growth in sustainable locations. The development could distract the Council from other regeneration priorities and would likely result in sprawl beyond the identified development areas. The development's uncertain deliverability could lead to high harm in peripheral areas not currently proposed for development. The proposed Local Centre may be too small to anchor such large development proposals and could cause high levels of out-commuting by car, as would the uncertain delivery of bus and cycle infrastructure. The delay in the Local Centre's delivery could entrench car-dependency, contrary to London Plan Policy T1. The facilities provided might be smaller than expected for such a large development. The development could pressure the Council to permit applications that do not deliver all the benefits of a masterplan if a high housing target is adopted. The 50% affordable housing requirement is not supported by the Whole Plan Viability update by HDH (2023). Enfield Road Watch believes there is insufficient land for 5,500 dwellings. The land assembly picture remains uncertain despite the

Council's repeated Calls for Sites since 2015. The needs case for a secondary school could drive development significantly beyond the indicated areas. The policy potentially allows for development on the golf course's fairways and greens, enabling development over a larger area. The policies would not effectively protect and enhance ecologically sensitive habitats. There are inconsistencies within the Crews Hill policy and site allocations regarding the Glasgow Stud SINC. The proposals for new parks and open spaces are ineffective as it is unclear whether landowners would sacrifice land with significant development value once released from the Green Belt.

- 3.126 CPRE London: CPRE London opposes the development of Green Belt land at Crews Hill (PL11), emphasising its importance to the Metropolitan Green Belt and arguing that Enfield has sufficient brownfield land and existing major sites like Meridian Water for housing development. They state that Crews Hill, known for its plant nurseries and horticulture goods, is unsuitable for development, and urbanisation would adversely impact Sites of Importance for Nature Conservation at Crews Hill Golf Course and Glasgow Stud. Additionally, the Chain Walk Public Right of Way, Burnt Farm Ride Public Bridleway, and views from the Ridgeway would be compromised. Increased traffic would harm rural lanes, and the site is unlikely to meet the London Plan's requirements for non-car travel due to its proximity to the M25 and challenging topography for cycling infrastructure.
- 3.127 Enfield Society: The Enfield Society opposes the large-scale removal of land from the Green Belt particularly at Kings Oak Plain. They argue that the railway line should remain the Green Belt boundary. A Landscape Appraisal by consultants ENPlan found that the proposed development, especially the taller buildings, would be visible above the golf course's wooded horizon. The Society argues against using brooks to delineate boundaries, as it could lead to intrusive development. They question the effectiveness of a landscape-led approach given the Council's dual role as landowner/promoter and local planning authority. The Society suggests that the entire area west of the railway line should be protected as an Enfield Chase Area of Special Character. The Society calls for the inclusion of Whitewebbs and Forty Hall ASC, Clay Hill ASC, and Turkey Brook Valley ASC in the Local Plan. They propose that the whole of Enfield Chase should be designated as an Area of Special Character. The Society have also commissioned a Heritage Impact Assessment by Archaeology South East assesses the impact of the development on heritage assets. The Society contends that the development proposals for Crews Hill as shown in the placemaking area diagram will harm ecological networks and the Glasgow Stud SINC, including a what they consider to be an irreplaceable acid grassland habitat at Crews Hill Golf Course as set out in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. They also highlight the area's limitations in terms of sustainable transport, with most trips likely to be made by car due to the infrequent bus service and challenging topography for cycling. They question the viability of the proposed Local Centre and the likelihood of achieving the London Plan target of 80% of all trips by sustainable means. Finally, the Society opposes seeking £5.483 million of 'compensatory' funding from Green Belt developments to pay for the refurbishment of Rectory Farm, due to the significant harm to the borough's character and historic landscapes.
- 3.128 Barnet Society: The Barnet Society see merit in concentrating new development in a compact new, genuinely sustainable settlement around Crews Hill Station. We also support retention of the area's horticultural and food-producing industries, and exploitation of the education, training and employment opportunities they offer. But we have strong reservations about the continuing commercial viability of Crews Hill's present businesses faced with soaring land values and traffic congestion and would like to see a commitment in the Plan to their protection. Significant rail, road and other transport improvements must accompany any development. Enfield's proposed Strategic Policies T1, T2 and T3 set out good principles for these, but there is a striking lack of detailed proposals for Crews Hill and its neighbourhood.
- 3.129 Bush Hill Park Residents Association: The Residents' Association assert that the historic Enfield Chase extends into the areas proposed under this Policy. Significant harm will be caused to the remaining parts of Enfield Chase by these proposals. The proposals will harm

the views from the Ridgeway across the historic landscape. The proposals for SA11.2 (currently a golf course) will remove the views of the historic landscape from the public right-of-way which runs from Cattlegate Road to Strayfield Road (Footpath #3). The scale of proposed development is very significant, and journeys are likely to be car-dominated over what are today narrow country roads. Whilst a bus service currently runs into Crews Hill, a long running and unresolved land dispute means it does not connect with the railway station. The proposals will mean the closure of dozens of small and medium businesses with the consequent loss of hundreds of jobs.

- 3.130 Residents/Businesses: Large numbers of residents objected to the placemaking area, due to concerns about developing Green Belt land and the loss of the popular garden centres and supporting businesses and related jobs, loss of green spaces, negative impact on views from the Ridgeway and rights of way along it, harm to designated Sites of Importance for Nature Conservation at Crews Hill Golf Course and Glasgow Stud, and urbanisation of the Chain Walk Public Right of Way and Burnt Farm Ride Public Bridleway. Residents highlights the integral role of nurseries in Enfield's Green Belt, attracting business from inside and outside the borough. The development threatens the Green Belt at Kings Oak Plain and recent tree planting in the area, the rural setting of Whitewebbs Transport Museum, and will increase traffic, altering the character of rural lanes and putting pressure on the Conservation Areas at Clay Hill and Forty Hall. Residents suggest the proposals are likely to be car-dominated with few local jobs and challenging cycling conditions due to steep slopes deterring cycling. Residents object to Policy PL11 due to the potential danger posed to leisure cyclists by increased car traffic on narrow lanes like Whitewebbs Road, Cattlegate Road, and East Lodge Lane. They argue that the historic landscape and natural environment of Enfield, enhanced by years of tree planting, should be preserved. Concerns also include increased pollution from traffic and unnecessary housing development in the Green Belt, which contributes significantly to the community's quality of life. Residents acknowledge the need for affordable housing but argue against using Enfield's Green Belt for this purpose. They suggest that there are ample brownfield sites within the borough, especially in areas like Lea Valley and Epping Forest borders, which could be developed instead. These sites would have a much lower environmental impact compared to the Green Belt, aligning better with sustainable development goals while preserving the borough's natural landscapes and historical sites and consider that policy PL11: Crews Hill should be deleted from the plan. They recommend deleting the policy to maintain the area's environmental and historical integrity. Residents express concerns that the proposed developments will significantly increase traffic in the area due to inadequate public transport services. They worry that nature conservation efforts at Crews Hill Golf Course will be compromised. The loss of long-standing garden centres, which have been a part of Enfield for many years, will be deeply felt if the development proceeds. Additionally, residents fear the proposed plans will obstruct historic vistas from the Ridgeway across the landscape of Enfield Chase. Residents oppose Policy PL11 due to concerns that building on this land will negatively impact the setting of Conservation Areas at Hadley Wood and Monken Hadley. They argue that the development would harm the historical and natural character of these areas, leading to a loss of green space and increasing urbanisation, which could degrade the unique charm and environmental quality of these conservation sites.

Chapter 4: Climate Resilience

- 3.131 Environment Agency: The draft Local Plan relies on an outdated SFRA, which does not reflect the latest flood risk data and climate change allowances. It needs to update the SFRA and apply the sequential and exceptions tests to all proposed allocations, deleting any sites that fail the tests or cannot be made safe. It also needs to incorporate the SFRA recommendations into the Local Plan policies and supporting text. The EA also stated that they are concerned that the Enfield Regulation 19 submission has not included a water resource and efficiency policy. The EA believe that including stand-alone policies with the latest data and advice would be beneficial to Enfield and the commitment to sustainability and ties this directly with London Plan Policy SL 5. The EA also expressed support for the

protection and improvement of watercourses. However, we recommend that the supporting text includes some explanation of the importance of protecting watercourses for water quality, habitat availability, and connectivity in ecological features.

- 3.132 Thames Water: Expressed a range of views regarding flood risk and surface water management issues in Enfield and suggested that the plan should restate as a policy requirement the water efficiency standards already set out in Building Regulations Part G and required as a planning condition. The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.
- 3.133 LB Waltham Forest: London borough of Waltham Forest (LBWF) generally support the policies in the Climate Resilience chapter. However, Policy SE4 should consider lowering the threshold for non-residential development, similar to Waltham Forest's policies, to maximise benefits.
- 3.134 Home Builders Federation: The Home Builders Federation (HBF) argues that the policy approach to the energy efficiency of buildings contained in Policy SE2 is unsound because it conflicts with national policy. Part 2 of the policy specifies that major developments should achieve a Home Quality Mark of 4.5, which diverges from current building regulations. The Government opposes local authorities setting their own energy efficiency standards, as stated by the then Housing Minister on December 13, 2023. The Government's stance is that multiple local standards increase costs and complexity for building new homes. The draft policy does not comply with the Government's requirement for additional standards to be a percentage uplift of the Target Emissions Rate (TER) using a specified Standard Assessment Procedure (SAP). The HBF also notes that, given viability challenges, particularly in the east of the Borough, the Council is unjustified in departing from the building regulations in this respect.
- 3.135 NHS Property Services: NHS Property Services (NHSPS) fully supports Draft Policy SE1's promotion of carbon-neutral development, aligning with the NHS's goal of achieving net zero carbon in all new projects. They suggest that NHS properties could benefit from carbon offset funds collected when on-site carbon mitigation cannot be met, aiding the NHS in becoming the world's first net zero healthcare provider. NHSPS considers the current wording of Draft Policy SE1 to be sound.
- 3.136 Enfield Climate Action Forum (EnCaf): The Climate Action Forum supports the policy direction of Chapter 4 but questioned Enfield's decentralised energy network due to the lack of an Energy Masterplan. The call for the policy to be strengthened and further evidence work to be prepared and for the policy to be amended to be in conformity with London Plan Policy SI 3 Energy Infrastructure which suggests boroughs should develop energy masterplans for large scale development proposals.
- 3.137 Better Homes Enfield: The campaign group welcome the inclusion of Policy SE3 and the requirement for all major proposals to include a whole life carbon assessment. However, they raised specific concerns around the approach to whole-lifecycle carbon assessments recommended in the plan, and around the delivery of low carbon energy supply in the borough through Energetik, the council's wholly owned heat network provider.
- 3.138 Other respondents: Other respondents including landowners and developers such as Vistry Group, Blackrock, McCarthy and Stone, British Land, Segro and Prologis criticised the climate resilience and sustainability measures in the plan including the proposed 20% net gain requirement and sustainable design and construction standards as being not justified or deliverable and requiring more flexibility in their wording, particularly in relation to the small-scale developments.

Chapter 5: Addressing Equality and Improving Health and Wellbeing

- 3.139 NHS Healthy Urban Development Unit (HUDU): The NHS London Healthy Urban Development Unit supports the policy's aim to protect community buildings and encourages the use of the NHS HUDU model. It supports SC1's aim to contribute towards active and healthy lifestyles and recommends adding a requirement for development proposals to plan for and optimise these lifestyles, including measures to reduce health inequalities. They also welcome the requirement for Health Impact Assessments for large schemes and suggest it should be a validation requirement to ensure health considerations are integrated from the early design stages.
- 3.140 NHS Property Services: NHS Property Services (NHSPS) welcomes and supports Draft Policy SC1, which commits to promoting healthier lifestyles and improving overall health and wellbeing through new developments. They endorse the requirement for Health Impact Assessments on larger residential developments, major strategic developments in areas with poor air quality, and significant education, health, leisure, and community facilities. NHSPS considers the current wording of Draft Policy SC1 to be sound. NHS Property Services (NHSPS) supports the provision of quality community facilities but finds Draft Policy SC2 to be overly restrictive and not positively prepared. NHSPS highlights the potential negative impact on the NHS's ability to deliver essential services if healthcare facilities are rigidly classified as community assets.
- 3.141 Sport England: Sport England notes that additional homes increase demand for sports and recreation facilities and questions why the policy does not seek contributions towards improving existing or new facilities. While outdoor play space contributions are mentioned under exceptional circumstances, there is a need for specific references to open space, sport, and recreation provisions to address the increased demand from new developments. Sport England make a number of detailed recommendations for changes to the policies.
- 3.142 Metropolitan Police Service: The Metropolitan Police Service Design Out Crime Team's response to this policy aims to ensure the timely provision of new or enhanced community facilities to meet the evolving needs of the borough's growing population. These facilities should preferably be located in defined town centres or accessible areas like public transport corridors. Community provisions under this policy include education and training, health and leisure facilities, children's play spaces, places of worship, burial spaces, libraries, pubs, cultural uses, and facilities related to community safety and security, such as police and emergency services.
- 3.143 Transport for London (TfL): TfL welcomes proposals for public realm improvements along main routes (A10, A406, A101) and at key stations and town centre gateways, as well as new crossings/bridges over the A10, A406, and Lee Valley line to address east-west severance. Early engagement with relevant infrastructure providers, including TfL, is essential. Additionally, confirming support for the Healthy Streets Approach would ensure consistency with other sections of the Local Plan.
- 3.144 Places for London (The TfL Property Company): Places for London broadly support Policy SC2. However, we strongly suggest that Sections 4 and 5 are amended to state that developer contributions 'may be sought' rather than 'will be sought', since these requirements will depend on the specific considerations set out within each policy relating to both healthcare and education.
- 3.145 McCarthy and Stone: McCarthy and Stone address Policy SC1, which requires the submission of a Health Impact Assessment (HIA) for residential developments over 50 units. They argue that older persons' housing should not be perceived as a burden on healthcare infrastructure. Instead, the policy should acknowledge the significant health benefits such housing brings to individuals. They highlight that older persons' housing promotes better physical and mental health, reduces demands on health and social services, and allows for

more efficient public resource use. McCarthy and Stone reference a report by WPI Strategy for Homes for Later Living, which details fiscal and well-being benefits, including annual NHS and social care savings of approximately £3,500 per resident and improved happiness and life satisfaction for older individuals. They emphasise that purpose-built housing for older people provides safe, warm, and adaptable living environments, contrasting with older homes that often present various health risks.

Chapter 6: Blue and Green Enfield

- 3.146 Natural England: Natural England welcomes and supports the inclusion of blue and green infrastructure policies in the Local Plan. In particular Natural England welcomes Policy BG2, which outlines the protection hierarchy for designated sites and ensures development does not adversely affect SPAs and SACs unless it meets regulatory requirements. They appreciate the requirement for a Habitats Regulations Appropriate Assessment for developments likely to impact SPAs, SACs, or Ramsar sites. Additionally, they support the recognition that new developments could impact the Lee Valley SPA and Ramsar site, as well as Wormley Hoddesdonpark Woods (SAC), due to air pollution and increased recreational pressure, and endorse the Local Plan's commitment to resisting developments that would significantly harm these sites. Natural England supports Enfield's commitment to achieving a minimum of 20% biodiversity net gain for new developments across the borough and welcomes Policy BG3's inclusion of the Epping Forest Strategic Solution, requiring measures to mitigate adverse impacts on the SAC from residential developments within 6.2km. They acknowledge Enfield Council's contributions to the Strategic Access Management and Monitoring Governance Agreement and the agreed Recreational Mitigation Strategy. They also appreciate that these measures must be delivered before occupation and in perpetuity, with Natural England's agreement. Regarding air pollution and habitat protection Natural England stated "The draft Local Plan needs to secure a strategic mitigation package for air pollution impacts on designated sites, especially Epping Forest SAC, before it is adopted. It also needs to complete an air quality assessment for the HRA and clarify the policy on biodiversity net gain."
- 3.147 Environment Agency: The EA stated that the draft Local Plan relies on an outdated SFRA, which does not reflect the latest flood risk data and climate change allowances. It needs to update the SFRA and apply the sequential and exceptions tests to all proposed allocations, deleting any sites that fail the tests or cannot be made safe. It also needs to incorporate the SFRA recommendations into the Local Plan policies and supporting text. The EA also expressed support for water pollution stipulations and recommendation for additional guidance and footnotes. They were also supportive and pleased to see a biodiversity net gain requirement of 20% but strongly recommend that the need for applicants to consider the watercourse module of the statutory biodiversity metric for all application boundaries within 10m from the top of the banks of watercourses, within 5m of ditches, and for culverts that run through a sites red-line boundary. Support for the set-back requirement for development near to watercourses and gave a recommendation to strengthen this to a minimum of 8m.
- 3.148 Epping Forest District Council: EFDC appreciates the inclusion of Strategic Policy BG3 for protecting the Epping Forest Special Area of Conservation (EFSAC). However, the policy lacks specific text on air quality, referring instead to Strategic Policy ENV1, which does not specifically address the EFSAC and focuses on major developments. EFDC suggests referring to the Inspector's Report for the Epping Forest Local Plan 2011–2033, which highlights the need for clarity and avoiding duplication in policies addressing air quality and the EFSAC.
- 3.149 London Borough of Redbridge: The London Borough of Redbridge recommends that the ELP's supporting text clarify that the 6.2km radius for the Epping Forest SAC 'Zone of Influence' is subject to review based on future Epping Forest Visitor Surveys. Additionally, they suggest that the appropriate Habitats Regulation Assessment (HRA) mitigation

contributions for SAMMs and SANGs should also be subject to review and updated accordingly.

- 3.150 Hertfordshire County Council (HCC): HCC Ecology supports the recognition of the Site of Metropolitan Importance along the River Lea corridor, emphasising its importance as a continuous river corridor habitat extending into Broxbourne. Other than the above considerations, HCC does not see a reason to raise any fundamental concerns regarding the impact of the proposed ELP Reg 19 as presented, in respect of impacts within Hertfordshire. It is hoped, however, that appropriate GI will also be proposed as part of any major developments to help offset any potential increases in disturbance locally which may result.
- 3.151 NHS Healthy Urban Development Unit (HUDU): The NHS London Healthy Urban Development Unit welcomes the aspiration for Enfield to become London's greenest borough and supports the enhancement of the Blue and Green Infrastructure network, particularly improvements to walking and cycling links and the promotion of food growing. The NHS London Healthy Urban Development Unit supports the policy's aim to promote food growing but notes the absence of minimum targets for developers, which raises concerns about the policy's deliverability.
- 3.152 Lee Valley Regional Park Authority: The Park Authority queried the strategic focus of Policy BG7 for enhancing beneficial uses and its relevance to the Lee Valley Regional Park area.
- 3.153 Sport England: Sport England supports policy BG8: Protecting Open Space but emphasises that temporary facilities should be avoided on playing field land to align with national and Sport England policies. They recommend that the requirement in 1.b. to restore open space to its original purpose should also ensure restoration to its existing quality. Additionally, part 1.d. should specify that any replacement open space must be of equivalent quantity and quality and serve the same function, such as replacing a lost playing field with another playing field, not just any open space. This would ensure compliance with Sport England policy and NPPF paragraph 103.
- 3.154 London Wildlife Trust: London Wildlife Trust recommended adding to Strategic Policy BG4: Biodiversity Net Gain, Landscape Restoration, and Offsetting under part 1 that all development proposals should follow the mitigation hierarchy (avoid, reduce [or minimise], mitigate, and compensate).
- 3.155 Canal and Rivers Trust: The trust was overall supportive of the council's vision for an integrated multifunctional green and blue infrastructure network and urged the council to support additional residential moorings on its network. It also noted that the River Lee Navigation was not always clearly referenced. Other respondents also commented on the suitability of residential moorings in some areas. The Trust is willing to engage further with the Council and encourages developers to have pre-application discussions.
- 3.156 Swifts Local Network: Swifts & Planning Group: We support policy BG4 in principle, but it is not sound because there is insufficient detail to be effective, and it is not consistent with national policy, because it does not consider London Plan policy G6 B4 and NPPG 2019 Natural Environment paragraph 023 which highlight the importance of swift bricks. Swift bricks are overlooked by the DEFRA BNG metric so need a separate clear policy.
- 3.157 CPRE London: supports the Plan's commitment to resist the loss of designated open space but suggests it should go further given increasing housing density. They recommend addressing green space needs per person to ensure sufficient amenity space, especially in high-density areas. They propose creating new green spaces in areas of deficiency, converting superfluous roads into 'streetparks,' and allocating railway sidings for nature recovery. They also advocate for policies to protect front and back garden vegetation, all mature trees, and private or semi-private amenity spaces, suggesting stronger protections like Town/Village Green status or Local Green Space designation. An example provided is the

Falcon Fields Allotment, which should be designated to preserve its natural heritage and community value.

- 3.158 Tottenham Hotspur Football Club: The Club queried the detailed focus of enhancing the beneficial uses in Policy BG7 and also questioned the requirement for 20% Biodiversity Net Gain.
- 3.159 Home Builders Federation: The Home Builders Federation (HBF) argues that Part 2 of the policy, which requires a 20% improvement in biodiversity net gain (BNG), is unsound, unjustified, and contrary to national policy that advises a minimum of 10%. They highlight that the viability assessment was based on a 10% BNG assumption and increasing this requirement to 20% would challenge many residential schemes, particularly in medium and low-value areas. These areas, including the strategic allocations associated with Meridian Water, have historically faced development challenges. HBF contends that it is unsound for the Council to exceed the national BNG policy, given these viability issues. They also queried the specific wording around the Zone of Influence and developments outside of it in relation to the recreational mitigation strategy for Epping Forest SAC.
- 3.160 Developers, landowners, and agents: Numerous developers considered the requirement for a 20% Biodiversity Net Gain (BNG) is inconsistent with national requirements and not effective, justified or deliverable on viability grounds. Some such as Vistry also queried the need for Blue and Green Infrastructure Plans as part of planning applications and the ambition for schemes to exceed the London Urban Greening Factor Metric.
- 3.161 The Enfield Conservative Group: Eliminate vague wording and qualifying statements in policies BG8, BG10, DE10, and DE15 that give planning officers excessive discretion.
- 3.162 Edmonton and Winchmore Hill Conservative Group: The Edmonton and Winchmore Hill Conservative Association objects to the local plan proposal to build a crematorium at Church Street Recreation Ground.
- 3.163 Enfield Climate Action Forum: EnCaf Land Use Working Group (ELUWG) highlighted the community campaign to re-open Banbury Reservoir and create an adjacent public open space from a designated waste site. They also set forward the view that Policy BG7 for enhancing the beneficial uses within the Green Belt was not in conformity with the London Plan nor in line with National Policies. EnCaf Land Use Working Group (ELUWG) also support the regeneration of Meridian Water; however, in our opinion the quantum and quality of open space and recreational space proposed for PL5, which is within the 'Enfield Epping Forest SAC Recreation Mitigation Strategy 2023' is far too low and likely to negatively impact the Epping Forest Special Area of Conservation. They also largely support the aims of ELP BG11(3), however, our review of the ELP site allocations suggests that very little provision has been planned for food growing spaces and allotments in practice, and none in urban areas identified in the Blue and Green Strategy Audit as areas of deficiency.

Chapter 7: Design and Character

- 3.164 Historic England: Historic England highlight that a key soundness issue with the draft Local Plan is the approach to tall buildings in Policy DE6. They appreciate the clarity on locations and heights of tall buildings, but object to the clause suggesting an acceptable level of harm to heritage assets, which contradicts the NPPF and the Town and Country Planning Act 1990. The policy's current wording implies that development could harm heritage assets, including conservation areas, without clear and convincing justification. Historic England recommends removing references to likely harm and ensuring that proposals for tall buildings consider impacts on heritage assets and comply with the overall Plan requirements. They are willing to address these issues through a Statement of Common Ground or participate in hearings if necessary.

- 3.165 Greater London Authority: The GLA state that the draft ELP identifies 58 locations for tall buildings, meeting LP2021 requirements. However, the GLA suggests considering broader areas rather than specific sites to facilitate understanding of potential harm. Policy DE6 should specify that tall buildings should only be developed in suitable locations. GLA suggests removing exceptions in Parts 5 and 6 of the policy to avoid perception of inconsistency in application across the Development Plan. The draft ELP provides various definitions of tall buildings across different parts of the borough, leading to inconsistency. GLA recommends clarity regarding where the measurement begins and consistency in defining tall buildings, whether measured from AOD or ground level. Seven small areas in the borough have different tall building definitions without explanation. GLA suggests providing rationale to underpin this approach and identify potential harm if development exceeds stated heights. The site allocations set maximum building heights, by using terminology such as ‘...tall buildings of no more than X m in height...’ This is not considered to be consistent with Policy D9 of the LP2021, which states that any such locations and appropriate building heights should be identified on maps in Development Plans. This implies some flexibility which could include a range of ‘appropriate building heights’. This is considered to be practical in terms of enabling boroughs to focus the tallest buildings in a particular part of a tall building zone and potentially lower building heights as the context and townscape indicates.
- 3.166 London Borough of Waltham Forest: London borough of Waltham Forest (LBWF) support the approach to tall buildings and appreciate the alignment with London Plan Policy and additional design guidance for tall buildings. London borough of Waltham Forest (LBWF) also support the approach to protecting and managing the historic built environment.
- 3.167 NHS Healthy Urban Development Unit: The NHS London Healthy Urban Development Unit welcomes the policy supporting inclusive design in line with London Plan policy D5, as well as the requirement for submitting an Inclusive Design Statement. The NHS London Healthy Urban Development Unit emphasises that tall buildings must be safely designed to protect residents and users from fire and other emergencies and to minimise the risk of suicide. They advocate for extra scrutiny at the planning stage to ensure safety considerations from design inception, including the materials and construction systems used.
- 3.168 The Metropolitan Police: The Metropolitan Police Service Design Out Crime Team emphasises that all developments should create safe and secure places by adhering to Secured by Design principles. Applicants must consult with Metropolitan Police crime officers early in the planning process and detail security measures and compliance within the Design and Access Statement (DAS). The Council will involve the Metropolitan Police in all major development planning applications. In high-crime areas, Secured by Design certification may be required for planning consent. If conflicts arise between Secured by Design principles and other urban design goals, applicants must justify the compromises in their DAS.
- 3.169 London Wildlife Trust: Whilst we welcome the overall strategic approach to tall buildings in the borough, we remain concerned that no reference is made to the particular impacts that tall buildings can have on biodiversity such as birds (daytime and nocturnal strikes), bats and nocturnal insects, in terms of their shading, lighting, wind tunnelling, facade treatments and location. The Lee Valley is a noted migration flyway for birds during early spring and autumn.
- 3.170 The Enfield Conservative Group: The Enfield Conservative Group argues that the Draft Plan's policy on tall buildings significantly deviates from the 2014 Development Management Document, which prohibited such buildings in sensitive areas. This policy shift is justified by an excessively high housing target, leading to the potential proliferation of tower blocks in low-rise residential areas. The Draft Plan lacks clear height thresholds for tall buildings and proposes significant height increases in several traditionally low-rise areas, which would adversely affect their character and violate London Plan requirements. The group highlights the negative social impacts of tall buildings, particularly in areas like Edmonton Green, and criticises the Character of Growth Study as fundamentally flawed. They emphasise that tall buildings in Enfield Town and other historically and architecturally sensitive areas are

inappropriate and unsound. The Councillor for Southgate Ward emphasised that Southgate is primarily composed of low-rise residential homes and businesses, including conservation areas. Introducing high-rise buildings would drastically alter the character of the area, contrasting sharply with the existing built environment. Councillor Emma Supple highlighted Enfield Town's historical significance, mentioning its ancient vicarage, church, and market square, which form an important heritage site. She argued that plans to build tall, tower buildings in this area are inappropriate and unacceptable, as they would harm the conservation area.

- 3.171 Home Builders Federation: The Home Builders Federation (HBF) argues the policy is unsound as it implies that pre-application advice is compulsory for securing a decision. Applicants have the right to submit a planning application without seeking pre-application advice. The HBF also argues that Part 1e of DM DE13: Housing standards and design is unsound as it contradicts national policy. The policy requires applicants to build according to the BRE Home Quality Mark, an environmental performance standard not endorsed by the Government. On December 13, the Government clarified that local authorities should not mandate alternative environmental standards, especially those related to energy efficiency. Therefore, the reference to the BRE Home Quality Mark should be deleted.
- 3.172 Developers, landowners and agents: A number of developers provided detailed comments on various aspects of the policies in this chapter. Some such as the Royal London Mutual Insurance Society Limited for Southbury Leisure Park and Places for London (Transport for London) supported the general alignment of Policy DE6 with The London Plan, but also highlighted potential inaccuracies in height definitions and the need for flexibility in site allocations. Many developers made representations to have their sites included in the areas defined as appropriate for tall buildings including Telereal Securitised Properties GP, SEGRO, Meridian Water, Joseph Homes, SEGRO and Areli Developments Ltd. ('ADL') on behalf of the Landowner of Stockingswater Lane ('Landowner'). Some landowners advocated a different definition of tall buildings. A number of developers also expressed concerns about the proposed requirement for pre-application discussions including Vistry, Blackrock and others, and the need to contribute planning contributions for Conservation Area Appraisal and Management Plans from developments with 50+ residential units and the viability challenges associated with this. There were other concerns raised around the impact of some of the requirements on viability, including around landscape and public realm, accessibility and amenity including daylight and sunlight and dual aspect homes as well as the proposed requirements for commercial development sites.
- 3.173 Residents/businesses: Numerous individual residents also responded regarding Policy DE6: Tall Buildings in reference to specific areas, stating that the policy was not sound or legally compliant due to the impacts on heritage and character. These included:
- Area 1: Cockfosters – Concerns around the impact of tall buildings on the Trent Park Conservation Area, Enfield Chase Area of Special Character, and the potential impacts of tall buildings on traffic and parking in the area.
 - Area 2: Enfield Town - Concerns around the impact of tall buildings on heritage assets in the area, including the conservation area, St Andrew's Church and the Market Square, on the retail offer of the town centre, and on traffic and parking.
 - Area 6: Southgate - Concerns around the impact of tall buildings on the listed Southgate Underground Station, and that these would be out of character with the predominantly low-rise suburban housing in the area. Concerns around traffic and parking and air quality impacts of development.
 - Area 8: Palmers Green - Concerns around the impact of tall buildings on the Lakes Estate Conservation Area, Broomfield Park, and character of Palmers Green. Residents suggest brownfield land should be prioritised for development.

Chapter 8: Homes for All

- 3.174 Greater London Authority: The target for 2019-2029 to deliver 12,460 new homes is noted and welcomed. The target beyond 2029 is based on various factors, including the 2017 SHLAA figures, small sites target, transport infrastructure, and local evidence of capacity. However, concerns arise regarding the inclusion of proposed developments like Chase Park and Crews Hill, requiring Green Belt release and exceptional circumstances. While the LP2021 sets a small sites' target, the Housing Topic Paper indicates a shortfall in delivery compared to the target. The GLA questions the relevance of the Government's standard methodology for calculating housing need in the London context, considering the adoption of the London Plan in March 2021. The GLA supports Part 6 of Policy H2 in the draft ELP, as it aligns with LP2021 Policy H5 Supported and Specialist Housing. The GLA emphasises that the affordable housing thresholds set out in the LP2021 are not minimum requirements but rather levels above which viability assessments are not required. While the clarity regarding the number of required Gypsy and Traveller pitches is appreciated, the absence of specific sites capable of accommodating these pitches is noted. Therefore, it's emphasised that Enfield Borough Council (LBE) must ensure provision for these pitches alongside addressing other housing needs outlined in the plan.
- 3.175 London Borough of Waltham Forest: London borough of Waltham Forest (LBWF) looks forward to the cooperation with them to identify the appropriate need and facilitate necessary provision for Traveller Accommodation. London borough of Waltham Forest (LBWF) support proposals for purpose-built student accommodation that meet strategic needs and ensure occupancy by specific educational institutions, including affordable options. With the University of Portsmouth establishing a facility in Waltham Forest and our strategic approach to developing student accommodation, collaboration between our councils on these proposals is crucial. London borough of Waltham Forest (LBWF) note that Enfield's guideline mix of 50% social/affordable rented housing and 50% intermediate housing contrasts with Waltham Forest's 70% low-cost affordable rent and 30% intermediate housing products.
- 3.176 Hertsmere Borough Council: Support for planning to meet the identified need for 21 pitches but questioning why this requires a separate local plan. Suggestion for small-scale private sites (5-6 pitches) to ensure better management and coexistence with settled communities.
- 3.177 NHS Healthy Urban Development Unit (HUDU): The NHS London Healthy Urban Development Unit generally supports Policy H5 and its goal to address the specialist needs of vulnerable people in Enfield. However, they suggest an amendment to criterion 8 to better reflect situations where specialist housing is best provided as part of a larger development. The NHS London Healthy Urban Development Unit (HUDU) supports the policy to provide student accommodation where there is an identified need in appropriate locations. However, they emphasise the need to consider the impact on local health infrastructure due to the influx of students, primarily aged 18-22. This demographic shift could affect the use of local services, increase reliance on urgent care, and significantly raise demands on mental, acute, and sexual health services. Additionally, the preference for digital services among students may necessitate further investments in local digital health services. The NHS London Healthy Urban Development Unit welcomes the policy's commitment to providing minimum levels of larger and family units to prevent cramped and poor-quality accommodation. They suggest allowing flexibility to adapt to changing demand and market conditions during the plan period. They also recommend ensuring all standards, not just space standards, are adhered to by suggesting revised policy wording.
- 3.178 Home Builders Federation: Broadly support approach to housing target but seek clarification on 5% difference between housing requirement and housing supply and justification for it. This point was also raised by the London Diocesan Fund. The Home Builders Federation (HBF) acknowledges finds the Council's planning for completions on small sites—379 dwellings per annum (dpa) for 2019/20 to 2021/22 and 281 dpa for subsequent years—reasonable and consistent with historic trends and windfall assumptions.

- 3.179 Vistry Group: Vistry Group supports the principle of 50% affordable housing on publicly owned land and 35% for other major developments, aligning with the London Plan (2021), and the 50/50 tenure split between intermediate and social rented housing. They aim to maximize affordable housing delivery through partnerships, sometimes achieving 100% affordable housing schemes. However, Vistry suggests draft policy H2 should consider site-specific circumstances impacting affordable housing delivery and explicitly state that the Viability Tested Route is available to justify lower affordable housing levels when necessary, reflecting market conditions and financial challenges.
- 3.180 McCarthy and Stone: McCarthy and Stone, a retirement housing developer, express concerns regarding Policy H5, which focuses on facilitating appropriate housing for elderly and vulnerable people in Enfield. They note that while the policy promotes independent living for the elderly, it is unclear what this entails and may be interpreted as adaptable conventional housing rather than specialist housing with care. They highlight that the identified need for specialist housing for older people (both C2 and C3 use classes) in Enfield is significant, as outlined in the Enfield Local Housing Needs Assessment and other documents. McCarthy and Stone argue that the policy should more explicitly support specialist housing to meet the needs of older people, in line with the latest NPPF, which emphasises the need to cater to different groups, including the elderly. They also object to the requirement for older persons' housing to provide affordable housing as stipulated in Policy H2 and suggest corresponding amendments to Policy H5 to align it with national policy and positively address the housing needs of older people.
- 3.181 Other landowners, developers and agents: A number of developers such as Landvest Crews Hill Limited, Places for London, NHS Property Services and Warmerden & Co (Crews Hill) Limited raised concerns about the viability impacts of affordable housing and housing mix requirements in the plan, particularly for key strategic sites. Some such as Rockwell property and the Diocese of London Raised concerns around the phasing and trajectory of specific sites and the lack of information published in this regard at Regulation 19 stage.
- 3.182 Enfield Climate Action Forum: Expressed concerns around the accuracy of the Council's HELAA process, and the accuracy of its small sites/windfall assessment and targets. Suggested a range of additional development management considerations in relation to small sites and requested a community-led call for sites process to support this. Suggested inconsistencies in housing figures within the evidence base, and highlighted ways in which the plan could go further to support family sized homes.
- 3.183 Better Homes for Enfield: Queried the evidence in the housing topic paper and how this has been set out, including the conformity of the Local Plan with Paragraph 4.1.11 of the London Plan and the need for a realistic windfall allowance based on past rates of small site delivery and suggested alternative time periods for this assessment. Highlighted potential inconsistencies in housing figures and HELAA as a result of the new revisions policy on net additional dwellings statistics and highlighted the potential impact of Census data on housing need. Highlighted the potential to consider concealed households in the assessment of housing need and in relation to housing mix policies. Raised concerns regarding the viability assessment and affordable housing requirements and queries around the detailed approach to viability assessment. Better Homes Enfield questions the ELP's approach to affordable housing, particularly its emphasis on larger family-sized homes. They suggest reconsidering viability assessments with a lower proportion of family-sized homes to enhance affordable housing delivery. They recommend adjusting the policy framework to ensure a higher delivery of affordable housing.
- 3.184 The Enfield Conservative Group: The Enfield Conservative Group suggested to clarify Policy Wording to focus on Brownfield Sites: Apply H4, section 2 only to brownfield sites to align with London Plan policy H1.

- 3.185 Other respondents: A very large number of template responses were received from residents. These stated “I consider the Plan not legally compliant and not sound, because it is (tick all that apply): Not positively prepared and justified because the housing target post-2029 is based on sites put forward for development, not whether they are actually needed, and without infrastructure improvements. That is unacceptable for Green Belt release., Not justified as the alternative/brownfield sites have not been prioritised and developed to their full capacity. Also, policy H4 should limit intensification within 800m of a station to brownfield sites, per London Plan policy H1., Not justified as the exceptional circumstances, especially for site RUR.02, have not been evidenced., Not consistent with national policies as allocation of site RUR.02 fails to take into account its designations, isolated location and it not being a sustainable development location., Not consistent with national policies and legislation as the extensive Reg.18 representations were not taken into account., Not consistent with national policy as it fails to adequately consider the Neighbourhood Plan policies and proposals.”
- 3.186 Please note, the proposed site allocations in the plan are listed in Policy H1 but responses in relation to these sites have not been considered here. A summary based on each placemaking area is provided above, and a full summary of representations from respondents relating to each individual site allocation is provided in Appendix B3. The full schedule of representations from individuals is available online from the council’s webpage.

Chapter 9: Economy

- 3.187 Greater London Authority (GLA): provided feedback on employment policies, recommending a clearer breakdown of the 304,000 sqm industrial and logistics space need into specific use classes, particularly B2 (General Industrial) and B8 (Storage and Distribution), for improved planning clarity. They suggest that Table 9.1 should specify whether potential sites for industrial floorspace intensification are Strategic Industrial Locations (SILs) or Locally Significant Industrial Locations (LSISs) and indicate the use classes they could accommodate. The GLA also advises adopting a plan, monitor, and manage approach for industrial intensification, prioritising brownfield sites and phasing in more challenging sites later in the Plan period. Additionally, they call for a coordinated plan-led approach to reconfiguring SILs at Meridian Water and stress that developments within or adjacent to SILs must not compromise industrial activities, with intensified industrial uses completed before residential components are occupied. Finally, they recommend breaking down performance indicators for net changes in SIL and LSIS floorspace into SIL and LSIS components and providing further details for Class B8 and B2 capacity.
- 3.188 ARGO Real Estate Limited: supports the Draft Local Plan’s focus on economic growth and industrial intensification, particularly within Strategic Industrial Locations (SILs). However, they critique Chapter 9 for not adequately supporting emerging high-tech industries, such as data centres. They recommend modifying the plan to include flexible, adaptable policies that recognise and promote these sectors, aligning with national and regional guidelines. ARGO advocates for policies that not only support traditional industrial, and logistics uses but also address the evolving needs of high-tech industries to fully leverage socio-economic benefits.
- 3.189 Danescroft (FRELD Claverings) LLP: supports the principle of redeveloping the Claverings Industrial Estate for industrial and logistics use. However, they raise concerns about the Council’s design principles, highlighting issues such as boundary inconsistencies, level differences, and unrealistic intensification targets. They propose measuring industrial intensification by volumetric capacity and operational yard space rather than just floorspace and recommend modifications to the draft site allocation masterplan. Additionally, Danescroft advocates for including a broader range of acceptable uses in Locally Significant Industrial Sites (LSIS) as per London Plan Policy E4(A), emphasising the need for flexibility in industrial intensification policies.
- 3.190 Vistry Group: provides feedback on the employment policies with a focus on several key areas. They comment on the requirements and amount of employment floorspace needed for

key sites, stressing the importance of site-specific considerations. They support the introduction of an affordable workspace policy aimed at meeting the needs of smaller businesses by offering spaces at least 10% below standard market rates. However, Vistry Group finds the policy's current guidelines too general and burdensome for developers, recommending clearer guidance and expectations to ensure effective delivery of affordable workspaces.

- 3.191 Prologis: supports the draft policies related to Strategic Industrial Locations (SILs) and employment growth, particularly endorsing the focus on protecting SILs, intensifying sites, and incorporating multistorey logistics spaces. However, they note a discrepancy between Policy E1, which allocates 31,500 sqm to Ravenside Retail Park, and Site Allocation SA 5.7, which specifies different figures. Prologis suggests amending the policy to a "minimum of 32,500 sqm" to better align with the Local Plan and facilitate the development of a multi-level logistics hub.
- 3.192 SEGRO's comments on Policy E2: Promoting Jobs and Inclusive Business: they believe Policy E2 should incorporate flexibility, acknowledging that maximising employment floorspace through site intensification might not always be practical. They find the policy's expectations for small and medium enterprises (SMEs) and co-working spaces unclear and argue that it may not always be feasible to deliver the variety of workspaces and unit sizes required, depending on site-specific constraints. They suggest that Policy E3 should be revised for greater flexibility. They are concerned that the policy's rigid approach, especially regarding site-specific factors and market needs, could hinder nuanced decision-making. They advocate for a planning balance that considers various factors and allows for more adaptable policies. They criticise Policy E5 for being too rigid and lacking consideration for site-specific factors and the needs of employment occupiers. They argue that this inflexibility could obstruct business expansion and new employment opportunities. They also raise concerns about the policy's support for business relocation, suggesting it may introduce practical challenges and delays. They raise concerns about Policy DM E8: Providing for Workspaces requiring developments over 1,000 sqm to provide 10% affordable workspace, noting discrepancies between the policy's text and its application. They suggest incorporating an option for payment in lieu to accommodate different scales and operational models and highlight the lack of a viability assessment in the Plan's Evidence Base. They find the requirements in points 2 and a, b, and c of Policy DM E9: Local Jobs, Skills, and Local Procurement too burdensome and potentially counterproductive to investment. They suggest that the policy should be more reflective of the diverse employment sector and proportional to encourage redevelopment. They also seek clarity on the financial contribution calculation formula outlined in Appendix D.
- 3.193 The LBE Strategic Property team: supports the new ELP, especially the allocation of Land East of Junction 24 for a logistics hub. They recommend revising the plot ratio from the London Plan and suggest considering a single-storey design for practicality. They propose a flexible approach to employment floorspace, recommending an approximate figure of 48,000 sqm rather than a strict minimum. LBE SPS also emphasises the need for collaboration with Hertsmere Council and acknowledges that the Enfield portion of the site could proceed independently if necessary. They suggest the site is deemed deliverable per NPPF criteria: it is available (owned by LBE), suitable (currently Green Belt but allocated for employment development), and achievable (market-attractive with no major constraints). Initial feasibility studies support its development, either as an independent LBE project or part of a larger scheme including land in Hertsmere. LBE Strategic Property stresses the importance of ongoing cooperation with neighbouring Local Planning Authorities (LPAs), as required by the Localism Act 2011 and NPPF guidelines. They support the Council's Duty to Cooperate Compliance Statement (2024) and highlight the need for discussions with Broxbourne and Hertsmere to ensure a well-prepared and justified strategy for the Local Plan, particularly for the CHPA and Junction 24 sites.

- 3.194 Areli Developments Ltd. (ADL): supports the inclusion of site URB.28 (Land and Buildings South East of Stockingswater Lane) in Policy SP E1: Employment and Growth, which estimates an additional capacity of 80,753 sqm. They advocate for the capacity to be seen as a minimum rather than a maximum, suggesting that the policy be updated to reflect this flexibility. ADL's recommendations aim to allow for potential higher capacities if appropriate design solutions are identified, thus supporting the plan's goal of intensifying industrial land to boost employment.
- 3.195 Meridian Water team: supports the ELP's goal of delivering 304,000 sqm of industrial and logistics floorspace by 2041. They endorse the 'brownfield first' approach and the strategy of utilising urban sites for growth as set out in Policy SP E1: Employment and Growth. They support the safeguarding principle set out in Policy SP E3: Strategic Industrial Locations and the planned reconfiguration at Meridian Hinterlands sites. They believe the proposed range of land uses, including general and light industrial, storage and distribution, and research and development, aligns with London Plan Policies and supports diverse industrial and logistics needs. Meridian Water supports the industrial-led regeneration framework outlined in Policy E13 for the Meridian Hinterlands area. They appreciate the focus on delivering new workspaces before residential development and emphasise the need for future masterplanning to ensure effective industrial/logistics operations within a mixed-use setting. They recommend reflecting this masterplanning in site allocations policy and determining indicative capacity through future planning to optimise brownfield site use in line with London Plan Policy D3.
- 3.196 Blackrock UK Property Fund: critiques the Draft Local Plan's approach to employment and design policies by advocating for greater flexibility. They argue that mandatory pre-application advice for all planning applications is excessive and could burden both the Planning Authority and developers, thereby increasing costs and prolonging approval times without substantial benefits. In terms of employment growth, Blackrock emphasises that relying solely on multi-storey industrial configurations for intensifying employment land is insufficient to meet the diverse needs of Enfield's businesses. They recommend a more adaptable approach that includes a variety of development forms to address the broad spectrum of occupier requirements. Additionally, they caution against rigid reliance on vertical developments and highlight the practical difficulties associated with integrating affordable workspaces into new schemes, suggesting that such policies should be balanced with pragmatic considerations.
- 3.197 CCLA Investment Management (CCLA): representing the Landowner for site 5 Pickett's Lock Lane, suggests several revisions to enhance the Draft Local Plan's employment policies. They advocate for policy E1 to focus on improving productivity and operational efficiency rather than just expanding floor space, emphasising modern industrial needs. For policy E2, they recommend a pragmatic approach to intensification and modernisation of existing sites, rather than a one-size-fits-all solution. In policy E5, CCLA proposes incorporating elements like higher building heights and improved infrastructure to align with modern business requirements. They also recommend revising policy E7 to allow flexibility in site redevelopment, supporting modernisation over strict floor space requirements. For policy E8, they suggest focusing on providing suitable workspaces without mandating specific sizes for small or medium units. Lastly, CCLA critiques policy E9 for being overly restrictive and proposes removing penalties related to reducing floor space to avoid impeding development and maintaining competitive advantage.
- 3.198 Goodman UK Limited: raises several concerns and recommendations regarding the Draft Local Plan. They advocate for modifications to Chapters 7 and 9 to support a diverse range of modern and high-quality employment premises. Goodman regrets the removal of the proposed extension to the Great Cambridge Road SIL, arguing it would have addressed the need for additional employment land and improved site efficiency. They stress the importance of robust boundaries and the Agent of Change principle to protect industrial operations from residential encroachment. While supporting the direction of Draft Policy E3 on Strategic Industrial Locations, Goodman suggests aligning it more closely with the London Plan by

broadening the range of supported industrial uses. They also back the goal of industrial intensification in Draft Policy E5 but criticise the emphasis on business retention and relocation, arguing that such matters should be addressed commercially rather than through planning policies.

- 3.199 Henry Boot Developments (HBD): expresses several concerns and recommendations regarding the Draft Local Plan. They advocate for a flexible and transparent approach to site intensification, particularly for the Montagu Industrial Estate, arguing that the proposed 38,600 sqm of employment floorspace is not justified given current permissions. HBD opposes the draft plan's emphasis on Green Belt releases for industrial needs, believing this should be a last resort and that the focus should be on urban intensification. They highlight a potential conflict between the draft Plan's mitigation requirements and the London Plan's 'Agent of Change' principle, which protects the operational integrity of Strategic Industrial Locations (SILs) and Locally Significant Industrial Locations (LSILs). HBD supports the protection of employment land and the restriction of inappropriate uses in SILs but calls for greater alignment with existing permissions and infrastructure needs.

Chapter 10: Town centres and High Streets

- 3.200 National Highways Limited: supports the promotion of commercial and business development within existing areas and the re-occupation of vacant floorspace to mitigate traffic congestion on the M25 from local trips. They advocate for locating retail activities in sustainable areas with good transport links and stress the importance of considering the cumulative impacts of town centre activities, which generate trips. They highlight that primary shopping areas, often including high-trip attractions like medical centres and childcare venues, can significantly impact traffic, particularly during peak hours. National Highways underscores the need for transport assessments to address severe impacts on the strategic road network and to identify necessary transport improvements to manage these effects.
- 3.201 Transport for London (TfL): recommends modifying Part 2 of SP TC1 to emphasise that all development should enhance placemaking in town centres by creating an attractive and accessible public realm that is safe for all users at all times. They also support SP TC2's goal of achieving zero road deaths by the specified year, welcoming this commitment.
- 3.202 The Enfield Society: supports preserving distinctive features and historic character in town centres but is concerned that prioritising growth and investment might lead to the development of tall buildings that could negatively impact Conservation Areas and harm the historic environment, conflicting with national and London Plan policies. Regarding Enfield Town, they argue that its current status as a Major Town Centre under the existing Core Strategy has been effective without the need for tall buildings, suggesting that such significant changes are unnecessary for maintaining its role.
- 3.203 The London Borough of Waltham Forest broadly supports the approach in the Town centres chapter, particularly valuing its emphasis on growth and investment to ensure long-term vitality. They appreciate the focus on urban greening, links to green and blue networks, and the sequential approach to development. They also endorse the management of use-classes, markets, meanwhile uses, and co-working locations, as well as the strategies for development outside designated centres.
- 3.204 Asda Stores Ltd: supports the Placemaking Vision for Southgate and the inclusion of Asda's store within the District Centre boundary. They recommend clarifying Figure 3.7 to reduce ambiguity and emphasise the need for sufficient vehicular parking for food shopping despite supporting improvements to the pedestrian environment and reduction of surface car parks. They also suggest amending Strategic Policy TC2 to include "where appropriate to do so" for certain criteria, acknowledging that minor developments may not meet all policy requirements. Asda looks forward to engaging with the Council on a future Supplementary Planning Document (SPD) to further support the placemaking vision.

Chapter 11: Rural Enfield

- 3.205 NHS Healthy Urban Development Unit (HUDU): The NHS London Healthy Urban Development Unit supports the emphasis on landscape restoration, active travel initiatives, climate resilience initiatives, food growing areas and gardens, eco-tourism and leisure activities, and biodiversity offsetting.
- 3.206 Sport England: Sport England requests evidence to support the proposed improvements for sports excellence at Tottenham Hotspur's training ground in PL9: Rural Enfield.
- 3.207 London Wildlife Trust: London Wildlife Trust welcomes and support the policies in this chapter.
- 3.208 The Forty Hill and Bulls Cross Study Group: The study group highlights concern to tree planting and undefined "earth moulding" as acceptable environmental improvements in the Green Belt. They argue that both could be detrimental to the Green Belt, particularly affecting its views and openness, and are not defined in the NPPF or London Plan.

Chapter 12: Culture, Leisure and Recreation

- 3.209 Sport England: Sport England welcomes the strategy set out in policy CL4: Promoting Sporting Excellence but notes some elements do not comply with national policy or Sport England's Playing Field Policy. Concerns include: The council's Playing Pitch Strategy (PPS) from 2018 is outdated. Sport England encourages updating it or adding wording to paragraph 1 to ensure development and investment contribute to actions in the PPS and any other sports facility strategy. Sport England recommends that the council produce an updated Playing Pitch Strategy (PPS) and a Built Facilities Strategy (BFS). These strategies should be developed in partnership with Sport England and National Governing Bodies for Sport (NGBs). The Local Plan should include specific policies for indoor and outdoor sport facilities, including playing fields, based on a robust evidence base. These policies should focus on protecting, enhancing, and potentially developing new facilities to meet current and future demands. Sport England also objected to the loss of a number of sport facilities in the area. Sport England requests evidence to support the proposed improvements for sports excellence at Tottenham Hotspur's training ground in PL9: Rural Enfield. They note that this is not mentioned in the 2018 PPS or the Blue and Green Strategy, questioning the appropriateness of the location for enhancements. They ask for a strategic assessment of the grounds and clarification on which sports will be accommodated for the community. This situation highlights the need for an up-to-date PPS or BFS to justify the requirement for a sports facility and ensure it meets existing or future local sporting needs.
- 3.210 Lee Valley Regional Park Authority: Supported the broad approach to Culture, Leisure and Recreation in the Plan and its legal compliance but proposed minor amendments to the development management policies regarding leisure and tourism and visitor accommodation to ensure soundness.
- 3.211 Tottenham Hotspur Football Club: THFC generally supports the spatial approach of the Plan concerning land at Whitewebbs Lane, including the Club's Training Centre and surrounding land. However, several modifications are needed to correct inaccuracies, provide clarity, and make the Plan sound. THFC welcomes the opportunity to discuss these representations further with Enfield Council before the submission of the Local Plan or during its Examination to reach an agreement on the necessary modifications for accuracy and soundness. THFC supports Policy CL4's objectives of promoting sporting excellence across the Borough but suggests several changes to improve clarity and effectiveness. THFC proposes that the development management criteria in Policy CL4, intended to apply to all developments across the Borough, should not be applied to Allocation RUR.07.

- 3.212 Enfield Climate Action Forum (EnCaf): The EnCaf Land Use Working Group (ELUWG) supports the intentions of Policy CL5: Sport, Open Space, and Recreation in the ELP (Reg 19) but identifies several issues that render it non-compliant with relevant legislation and not sound. While acknowledging the health, social, and environmental benefits of open space, ELUWG highlights the lack of up-to-date evidence, particularly regarding the Playing Pitch Strategy, which limits the policy's effectiveness in addressing local deficiencies in sports facilities. They argue that the plan fails to provide adequate new open spaces in areas with existing deficits, such as Edmonton, where significant population growth is anticipated. ELUWG criticises the plan's reliance on outdated assessments and the unclear responsibility for managing new green spaces, which raises concerns about the viability and delivery of CL5's objectives. Furthermore, they point out inconsistencies between the policy and the overarching goals of the London Plan 2021 and the National Planning Policy Framework (NPPF 2023), particularly in terms of promoting healthy, safe communities and addressing open space needs. ELUWG suggests that the monitoring metrics should be improved to better track gains and losses in open space, allotments, play spaces, and playing pitches to ensure the policy effectively addresses identified needs and deficiencies.

Chapter 13: Movement and Connectivity

- 3.213 National Highways: National Highways' response regarding the Local Plan, which aims to deliver over 33,000 homes by 2041, emphasises the need for robust Transport Assessments (TAs) for significant housing sites, especially those near the M25 and Strategic Road Network (SRN) junctions. They stress the importance of demonstrating no residual impacts on the SRN and ensuring mitigation measures are fully funded. National Highways recommends developing TAs in consultation with them to address traffic impacts and support sustainable infrastructure. They endorse the promotion of active travel, integration of active travel networks, and reducing car dependency to mitigate impacts on the M25. National Highways' response regarding policies T1 and T3 and the requirement for a Transport Assessment (TA) includes support for the TA to ensure sustainable infrastructure. However they stated that "the assessment is unclear as to the transport impacts of the Local Plan on the M25 at and around Junctions 24 and 25. In relation to Table 5-1 (repeated as Table 4-3 of the Infrastructure Development Plan) the descriptive impacts do not provide the full picture, including additional delays to off slips at both junctions and additional queues at M25 Junction 24 eastbound off slip with the additional Local Plan development that would likely queue back onto the main carriageway. We have been in dialogue with Enfield Council and their consultants about these potential impacts at M25 Junctions 24 and 25. Accordingly we have requested that Enfield Council look at these delays in more detail as there is some uncertainty around these queues and delays given the strategic nature of the assessment. We are awaiting further transport modelling evidence to discern whether the Local Plan is sound in relation to impacts at M25 Junctions 24 and 25. As mentioned above we are awaiting further details of the likely transport impacts at M25 Junctions 24 and 25. We will then be able to judge whether there is an unacceptable impact and a need to future proof the network in accordance with Paragraphs 51 and 52 of DfT Circular 01/2022. . A 'monitor and manage' strategy may be required moving forward but this will be discussed and reflected within a SoCG.
- 3.214 Transport for London: TFL express their support for the draft Local Plan's objectives of delivering sustainable growth and reducing car dependency but raising serious concerns about the soundness and viability of the placemaking areas at Crews Hill and Chase Park. They argue that these locations have poor public transport accessibility and would require significant investment in transport infrastructure, urban design, and parking management to achieve the desired outcomes. They also emphasise the need for a clear and robust masterplan and IDP to guide the development and delivery of these areas. They question whether these areas are consistent with the Good Growth principles of the London Plan and the transport objectives of the Mayor's Transport Strategy.
- 3.215 Greater London Authority: The GLA welcomes the draft local plan's aspiration to support sustainable growth by promoting walking, cycling, and public transport.

- 3.216 Hertfordshire County Council (HCC) Highways: HCC state the plan is wholly consistent with Hertfordshire's policies and general approach from a sustainable travel perspective and therefore is supported. The principles around strategic sites in particular are welcomed, in terms of ensuring sites are highly accessible by sustainable travel. HCC do however have some specific concerns regarding some of the spatial allocations, as well as the wording around parking policies.
- 3.217 Broxbourne Borough Council: Overall, Broxbourne Borough Council highlights discrepancies in traffic modelling outputs and expresses concerns about the potential adverse impacts of the proposed developments in Enfield on the highways network in Broxbourne. They argue that these issues need to be addressed to ensure the soundness of the ELP.
- 3.218 London Borough of Waltham Forest: London borough of Waltham Forest (LBWF) considers adding "appropriate parking provision that seeks to minimise car parking" to ensure active travel and modal shift are prioritised.
- 3.219 Network Rail: Network Rail (NR) currently has no capacity concerns regarding proposed housing numbers but requires ongoing consultation. NR welcomes private investment for capacity and accessibility improvements at stations and in the network. They highlight the importance of integrated travel improvements and the potential for Crossrail 2 on the West Anglia Main Line, while discouraging permanent redevelopment within the safeguarded Crossrail 2 corridor.

Chapter 14: Environmental Protection

- 3.220 Natural England: Natural England welcomes Policy ENV1's commitment to ensuring all major developments are at least air quality neutral, which will help reduce air quality impacts on designated European sites. However, they emphasise the need for further measures to ensure smaller developments do not harm these designated sites.
- 3.221 Environment Agency: Support for policy approach to protection of Source Protection Zones.
- 3.222 London Wildlife Trust: London Wildlife Trust supports policy ENV1 and recommends adding to paragraph 14.17 that lighting should avoid unnecessary energy use and adverse impacts on road safety and wildlife. Specifically, lighting can disrupt ecosystems of nocturnal species, especially near water and migration paths like the Lee Valley. It is essential to ensure lighting is focused only on intended areas to prevent spillover effects on surroundings.
- 3.223 Metropolitan Police Service: The Metropolitan Police Service Design Out Crime Team highlights the importance of lighting in enhancing community safety and supporting nighttime activities. However, the policy seeks to prevent light pollution, including glare and light spillage, to avoid negatively impacting residential amenities or the countryside's character. The goal is to balance the benefits of lighting for safety and evening activities with the need to protect the environment and quality of life.

Chapter 15: Delivering and Monitoring

- 3.224 Department for Education: The Department for Education (DfE) states that under the Education Act 2011 and the Academies Act 2010, new state schools are now academies/free schools, with DfE as the delivery body rather than local authorities. Local authorities, however, retain the responsibility for ensuring sufficient education provision and securing contributions from development. DfE aims to collaborate closely with local education departments and planning authorities to meet the demand for new education infrastructure and has provided guidance on securing developer contributions and estimating pupil yields. The DfE supports the Council's policy SC2 on safeguarding land for schools but finds the plan unsound regarding the level of developer contributions towards education. Enfield's Draft Local Plan proposes a contribution of £3,324 per dwelling, whereas DfE guidance suggests

the cost should be £11,960 per dwelling based on current pupil yield data and school place costs. The DfE recommends Enfield clarify their methodology to accurately reflect pupil yields and costs, ensuring that the total cumulative cost of complying with policies does not undermine plan deliverability. Without these modifications, the DfE considers the plan not positively prepared and lacking a justified and effective approach to education provision.

- 3.225 Transport for London: TfL welcomes the requirement for developments to contribute towards improvements at Enfield Town station, although they cannot commit to increased peak hour frequencies. They also support the requirement for car-free development, consistent with the London Plan and considering the PTAL of up to 6a. TfL welcomes the statement about seeking contributions to increase station capacity and improve station access. They note that while gateline capacity could be increased within the existing station, achieving step-free access may require a broader station reconfiguration and access to adjacent land. TfL reiterates that contributions towards public transport improvements should have equal priority with affordable housing to align with the London Plan. Such contributions are necessary for development in the Placemaking areas, as specified in the individual policies. This priority should be reflected in the Infrastructure Delivery Plan.
- 3.226 Thames Water: We consider it important that there should be a specific policy relating to Wastewater/Sewerage and Water Supply Infrastructure. We consider that the Local Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5-year periods (Asset Management Plans or AMPs).
- 3.227 Sport England: Sport England notes that additional homes increase demand for sports and recreation facilities and questions why the policy does not seek contributions towards improving existing or new facilities. While outdoor play space contributions are mentioned under exceptional circumstances, there is a need for specific references to open space, sport, and recreation provisions to address the increased demand from new developments.
- 3.228 Home Builders Federation: The Home Builders Federation (HBF) argues that aspects of the policy are unsound and contrary to national policy. They appreciate the Council's prioritisation of affordable housing but note concerns with other priorities. HBF asserts that biodiversity net gain (BNG) of 10% is already a legislative requirement and should not be included in S106 agreements. They oppose the plan's 20% BNG requirement, as only 10% was tested for viability. HBF also recommends removing climate change goals from the list, as these are covered by Building Regulations. Additionally, they argue that skills training is a strategic issue better addressed at a national or London-wide level and not suitable for local planning gain. They suggest concentrating development gains on affordable housing and key infrastructure.
- 3.229 Vistry Group: Vistry Group supports reducing financial contributions for job loss and apprentice requirements while acknowledging the importance of adjusting financial obligations for inflation. However, they seek clarity on various contributions not listed in Appendix E, such as flood mitigation, public transport, cooling measures, green infrastructure, heritage impacts, conservation appraisals, public art, and EV charging points. Understanding these contributions is essential for assessing site viability and informing proposals. Additionally, they request more details on contributions related to Epping Forest and conservation area appraisals.
- 3.230 NHS Property Services: NHS Property Services (NHSPS) supports Draft Policy D1, which requires that new developments meet relevant policies and infrastructure requirements in a timely manner, with an allowance for reduced S106 contributions if demonstrated to render the development unviable. NHSPS particularly welcomes Parts 3 and 5, which ensure that developments provide on-site infrastructure or, where not possible, contribute to off-site

provisions. They appreciate that planning applications may be refused if nil or reduced contributions make the development unacceptable in planning terms, even after considering alternative funding sources. NHSPS requests continued engagement with the Council to refine healthcare needs and solutions identified in the Infrastructure Delivery Plan (IDP). They emphasise the need for flexibility in determining how to meet healthcare needs, including financial contributions, new on-site infrastructure, free land/infrastructure/property, or a combination thereof. It is crucial that the NHS and its partners collaborate with the Council to formulate appropriate mitigation measures NHS Property Services (NHSPS) supports the draft policy requirements identified in the Whole Plan Viability Update but notes that the assessment does not specifically account for contributions towards healthcare. NHSPS recommends including a separate cost input for healthcare contributions in the viability assessment to ensure proper mitigation, inform developers of potential on-site or off-site financial requirements, and support effective implementation of Draft Policy D1. They express willingness to engage further with the Council to establish a reasonable cost assumption for future viability assessments.

- 3.231 Canal and Rivers Trust: The Trust generally aims to maintain its assets in a "steady state," with towpath maintenance based on current usage. When new developments are likely to increase usage, the Trust's maintenance liabilities will also rise. Therefore, it is reasonable to request financial contributions from developers either to cover the increased maintenance costs or to upgrade the towpath surface to a more durable standard that can handle increased usage without adding to the Trust's future maintenance burden. Additionally, there should be further clarity on the delivery of towpath improvements. While paragraphs 2.65-2.69 refer to walking and cycling, they do not mention the towpath or 'green loop.' This should be addressed for greater clarity.

- 3.232 Places for London – The TFL Property Company: Places for London request that Section 4 of Draft Policy SP DI in relation to review mechanisms refer to and accord with Policy H5 of the London Plan, Threshold Approach to Applications.

- 3.233 NHS HUDU: The NHS London Healthy Urban Development Unit (HUDU) supports Policy D1's commitment to securing funds for infrastructure through CIL and s106 contributions. They suggest health infrastructure should be prioritised higher in the Infrastructure Priorities list in figure 15.1, despite its interlinkage with other priorities like air quality and active travel. HUDU recommends that all site allocations mitigate their development's impact on health infrastructure, prioritising contributions to existing health site capacity. They also suggest that where site allocations include a health facility, the plan should reassess its necessity as it progresses, and s106 agreements should specify design requirements or include a fallback financial contribution if the space cannot meet NHS needs.

- 3.234 Better Homes for Enfield: Better Homes Enfield's response to housing KPIs in the draft ELP suggests several modifications to improve clarity and comprehensiveness. They recommend that KPIs for new homes (both net and gross) should include cumulative numbers for the entire plan period and separate reporting for small sites. Draft Policy H4 should be referenced in housing capacity metrics, and information sources should include brownfield registers and planning data. They propose separate reporting for different types of affordable housing (e.g., Social Rent, London Affordable Rent) and tracking affordable homes lost through demolition or Right to Buy. The response also suggests adjustments to KPIs for planning contributions, specialist housing schemes, Build to Rent, and student housing to include cumulative figures and detailed breakdowns. Additional KPIs are recommended for tracking HMOs, housing mix changes, permitted development conversions, Traveller accommodation, and contextual data such as the council house waiting list and vacant homes. These modifications aim to ensure the KPIs effectively monitor housing delivery and align with policy goals.

- 3.235 Historic England: It is clear that intensification of use of green space will follow from the proposed development, including that of Trent Park, which is both a conservation area and a registered park and garden. Contributions towards a management plan for the park should be

required so that this increased use can be planned for and mitigated. Suggested change: Include requirement that development proposals make contributions towards conservation area/registered park and garden management plan.

Appendix C: Site Allocations

Placemaking Areas

PL1 Enfield Town

SA1.1: Palace Gardens Shopping Centre

- 3.236 Transport for London: General Comment
- 3.237 Historic England: Proposed amendment to wording.
- 3.238 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.239 Environment Agency: Ground Source protection zone considerations. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.240 NHS London Healthy Urban Development Unit: Observations around the potential or a healthcare facility.
- 3.241 Politicians/Local/National Interest Groups: Objection from local councillors based on population statistics, objection from Better Homes based on the need for higher densities than proposed.
- 3.242 Promoters/Developers: Support for the allocation.
- 3.243 Residents/Businesses: Residents feel that more consultation is needed regarding the proposals for floorspace above commercial premises. They express that the current process involves an overwhelming amount of information, making it too complex for most people to effectively scrutinise and engage with the plans.

SA1.2: Enfield Town Station and Former Enfield Arms

- 3.244 Transport for London: Proposed amendments to strengthen policy wording from should to must.
- 3.245 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.246 Environment Agency: Ground Source protection zone considerations. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.247 Historic England: Amendments suggested around the placement of taller buildings and the need to respond to the historic character of the area.
- 3.248 NHS London Healthy Urban Development Unit: Observations as above.
- 3.249 Politicians/Local/National Interest Groups: Objections. The Enfield Society raised a number of issues around tall buildings in this location.

SA1.3: Tesco, Southbury Road

- 3.250 Transport for London: Proposed amendments to strengthen policy wording from should to must.

- 3.251 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.252 Environment Agency: Ground Source protection zone considerations. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.253 NHS London Healthy Urban Development Unit: Observations as above.
- 3.254 Politicians/Local/National Interest Groups: Better Homes suggests that incorporating the Royal Mail depot and Savoy Parade properties could significantly enhance housing capacity.

SA1.4: Enfield Civic Centre

- 3.255 Transport for London: As above.
- 3.256 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.257 Environment Agency: Ground Source protection zone considerations. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.258 NHS London Healthy Urban Development Unit: Observations as above.
- 3.259 Politicians/Local/National Interest Groups: Better Homes suggests that integrating the disused police station site between SA1.4 and SA1.7 could significantly enhance housing capacity. Enfield Society raise concerns about tall buildings on the site.
- 3.260 Residents/Businesses: Residents express agreement with the consolidation of council departments to reduce costs but strongly disagree with the proposal to incorporate high-rise domestic dwellings. They oppose high-rise buildings and any reduction of green space in the borough, advocating for the use of brownfield sites instead of green belt land to meet development needs. Their concerns emphasise maintaining the character of the area and preserving existing green spaces.

SA1.5: St Anne's Catholic High School for Girls

- 3.261 Transport for London: As above.
- 3.262 Sport England: Sport England objects to the application as it appears to advocate the loss of the leisure centre without it being replaced. As result, this would not meet NPPF, paragraph 103.
- 3.263 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.264 Environment Agency: Ground Source protection zone considerations. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.265 Politicians/Local/National Interest Groups: Objection.

SA1.6: 100 Church Street

- 3.266 Transport for London: As above.
- 3.267 Environment Agency: The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.268 Politicians/Local/National Interest Groups: Concerns from the Enfield Society regarding the extant planning permission on the site.

SA1.7: Oak House, 43 Baker Street

- 3.269 Transport for London: As above.
- 3.270 Environment Agency: The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

PL2 Southbury

SA2.1: Colosseum Retail Park

- 3.271 Transport for London: Comment as above.
- 3.272 NHS London Healthy Urban Development Unit: Observations recommending ongoing negotiations with the Integrated Care Board (ICB) to ensure appropriate phasing and delivery of healthcare services.
- 3.273 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.274 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.
- 3.275 Landowner/Developer: Blackrock UK Property Fund's response highlights concerns that this permission is unlikely to be implemented before it lapses in July 2024. They suggest that the site allocation should be amended to include industrial development (B2/B8 uses) to improve viability and align with demand for employment uses.
- 3.276 Politicians/Local/National Interest Groups: Better Homes note site is listed with a capacity of 1,587 homes, whereas the approved application allows for up to 1,800 homes, questioning why the lower figure is used.

SA2.2: Heritage House

- 3.277 Transport for London: Comment as above.
- 3.278 Landowner/Developer: BL Logistics Investment Limited (British Land) supports the land use principles set out in draft site allocation Policy SA2.2 - Heritage House, and the identification of the site for industrial redevelopment under Use Classes E(g)iii, B2, and B8, subject to the necessary amendments detailed in their representations.

SA2.3: Morrisons, Southbury Road

- 3.279 Transport for London: TfL supports in principle replacing the footbridge over Southbury Road with a pedestrian crossing. Other comments as above.
- 3.280 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.281 Environment Agency: Ground Source protection zone considerations.
- 3.282 Politicians/Local/National Interest Groups: Better Homes state the site was proposed for 892 homes, a feasibility study indicated that 1,050-1,250 units are achievable, but the ELP only estimates 646 units, which is significantly lower. They question the basis for this reduction, citing incomplete reports and a lack of clarity in the Council's Site Allocation Topic Paper. Consequently, the site has not been optimised.

SA2.4: Southbury Leisure Centre

- 3.283 Transport for London: TfL welcomes the requirement for developments to contribute towards improvements at Southbury station. Other comments as above.
- 3.284 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.285 Environment Agency: Ground Source protection zone considerations.
- 3.286 Landowner/Developer: Support, but with comments

SA2.5: Tesco, Ponders End

- 3.287 Transport for London: Comment as above.
- 3.288 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.289 Environment Agency: Ground Source protection zone considerations.

SA2.6: Sainsburys, Crown Road

- 3.290 Transport for London: Comment as above.
- 3.291 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.292 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

SA2.7: Crown Road Lorry Park

- 3.293 Transport for London: Comment as above.
- 3.294 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.295 Environment Agency: Ground Source protection zone considerations.

SA2.8: Land and buildings north of Lincoln Road

- 3.296 Transport for London: Comment as above.

PL3 Edmonton Green

SA3.1: Edmonton Green Shopping Centre

- 3.297 Transport for London: Comment as above.
- 3.298 Environment Agency: Objection due to flood risk. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.299 Historic England: Amendments proposed to recognise the Southgate Circus conservation area.
- 3.300 Sport England: Comments regarding the need for more sport facilities to be referenced in the policy.
- 3.301 NHS London Healthy Urban Development Unit: Support with comments.

SA3.2: Chiswick Road Estate

- 3.302 Transport for London: TFL note the site is in a high PTAL area and should be car free.

- 3.303 Environment Agency: Objection due to flood risk. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

PL4 Angel Edmonton

SA4.1: Joyce Avenue and Snells Park Estate

- 3.304 Transport for London: The development should be car free.
- 3.305 Sport England: This allocation is delivering a significant number of homes which will increase demand on open space, sport and recreation provision in the area and this should be more clearly recognised in the policies.
- 3.306 NHS London Healthy Urban Development Unit: Proposed amendments to clarify the provision of new health centres in the area to respond to new development and population increases.
- 3.307 Environment Agency: The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

SA4.2: Upton Road and Raynham Road

- 3.308 Transport for London: TfL welcomes the requirement for the development to contribute towards access, facilities, and interchange improvements at Silver Street station. Others comments as above.
- 3.309 Environment Agency: Objection as site is FZ2 and FZ3. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

SA4.3: Langhedge Lane Industrial Estate

- 3.310 Transport for London: Comment as above.
- 3.311 Environment Agency: The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

SA4.4: South-east corner of North Middlesex University Hospital Trust

- 3.312 Transport for London: Comment as above.
- 3.313 Environment Agency: The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.314 Landowner/Developer: Vistry Group supports the draft site allocation for the North Middlesex University Hospital site (SA4.4) but requests amendments for greater flexibility. They suggest increasing the housing capacity from 260 to 300 homes, updating the delivery timeframe, and ensuring the Planning Brief link is functional. They recommend reconciling contradictory design principles regarding the non-designated heritage asset and allowing for taller buildings up to 48m (16-storeys) instead of 39m (13-storeys).

SA4.5: Public House, 50-56 Fore Street, London

- 3.315 Transport for London: Comment as above.
- 3.316 Environment Agency: The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.317 Politicians/Local/National Interest Groups: Better Homes Enfield asserts the site is listed with a capacity of 58 homes, despite having planning permission for 110 homes.

PL5 Meridian Water

SA5.1: Meridian Water Phase 1

- 3.318 Transport for London: Comment as above.
- 3.319 Thames Water: Comments regarding network capacity and ground source protection zones.
- 3.320 Environment Agency: Ground Source protection zone considerations and flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.321 Sport England: Sport England would like to see specific mention under 'infrastructure requirements' of playing fields and recreation facilities delivered on site or contributions made off-site. Decisions for on and off- site contributions should be based on an up-to-date PPS and BFS which will provide key evidence to support the strategic need for sport facilities.
- 3.322 NHS London Healthy Urban Development Unit: A healthcare delivery plan should be secured for the site, and any subsequent applications should include a similar agreement to provide a health facility.
- 3.323 Landowner/Developer: The Meridian Water team welcomes the inclusion of various Meridian Water sites, including those under Enfield Council ownership: Meridian Water Phase 1, Meridian Water Phase 2, Meridian 13, and Meridian East (Harbet Road). They are keen to maintain a positive and constructive dialogue with the Local Planning Authority (LPA) to refine the Site Allocations' requirements, ensuring the draft allocations are based on up-to-date evidence and thus justified. This includes addressing gaps and inconsistencies in the accompanying plans, which can be readily rectified. Vistry Group supports the draft site allocation for Meridian Water Phase 1 (SA 5.1) but requests amendments to reflect planning permissions and development potential. They propose including a row for non-residential floorspace in the table, updating Footnote 8 to reference extant planning permissions, and revising design principles to allow for buildings up to 100m in height. Additionally, they seek to align the draft site allocation with the Tall Building Maps in Appendix C, reflecting the approved heights and ongoing discussions with the Council.
- 3.324 Politicians/Local/National Interest Groups: Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

SA5.2: Meridian Water Phase 2

- 3.325 Transport for London: Comment as above.
- 3.326 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.327 Sport England: Objection because of the loss of equestrian land.
- 3.328 NHS London Healthy Urban Development Unit: Observations recommending ongoing discussions with the NHS regarding the funding and phasing of the health facility at each development phase.
- 3.329 National Grid: Support, but with comments.
- 3.330 Landowner/Developer: Supported as above, but with comments.

- 3.331 Politicians/Local/National Interest Groups: Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

SA5.3: Former IKEA store, Glover Drive

- 3.332 Transport for London: Comment as above.
- 3.333 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.334 Landowner/Developer: Support, but with comments
- 3.335 Tottenham Hotspur Football Club: Objection to the approach towards tall buildings, particularly the wording suggesting acceptable harm to heritage assets.
- 3.336 Politicians/Local/National Interest Groups: Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

SA5.4: Tesco Extra, Glover Drive

- 3.337 Transport for London: Comment as above.
- 3.338 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.339 Politicians/Local/National Interest Groups: Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

SA5.5: Meridian 13 (also known as Teardrop)

- 3.340 Transport for London: Comment as above.
- 3.341 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.342 Landowner/Developer: Support, but with comments
- 3.343 Politicians/Local/National Interest Groups: Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

SA5.6: Meridian East (also known as Harbet Road)

- 3.344 Transport for London: Comment as above.
- 3.345 Environment Agency: Objection due to flood risk. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.346 National Grid: Support, but with comments
- 3.347 Landowner/Developer: Meridian Water (LBE) state that for Meridian East (Harbet Road), it should be acknowledged that capacity figures are minimum estimates to be refined through

future masterplanning to optimise the brownfield capacity of these sites via a design-led approach in accordance with London Plan Policy D3.

- 3.348 Politicians/Local/National Interest Groups: Better Homes argues there are inconsistencies in the site capacities for Meridian Water and issues with the recreational mitigation agreed with Natural England.

SA5.7: Ravenside Retail Park

- 3.349 Transport for London: Comment as above.
- 3.350 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.351 Landowner/Developer: Prologis suggests changes to Policy SA 5.7 for Ravenside Retail Park to support multi-level logistics development.

SA5.8: Kenninghall Metals and Waste

- 3.352 Transport for London: Comment as above.
- 3.353 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

PL6 Southgate

SA6.1: Southgate Office Village

- 3.354 Transport for London: Comment as above.
- 3.355 Historic England: Amendments to recognise impacts on heritage assets.

SA6.2: Barnet and Southgate college

- 3.356 Transport for London: Comment as above.
- 3.357 Politicians/Local/National Interest Groups: The Councillor for Southgate Ward argued that the Local Plan's proposal to consider housing on the Barnet and Southgate College and Alan Pulling Youth Centre sites is inappropriate, as these sites should not have shared uses.

SA6.3: Michenden Car Park and Alan Pullinger Centre

- 3.358 Transport for London: Comment as above.
- 3.359 Politicians/Local/National Interest Groups: The Councillor for Southgate Ward argued that the Local Plan's proposal to consider housing on the Barnet and Southgate College and Alan Pulling Youth Centre sites is inappropriate, as these sites should not have shared uses.

PL7 New Southgate

SA7.1: Former Gasholder, New Southgate

- 3.360 Transport for London: Comment as above.
- 3.361 Environment Agency: Objection due to flood risk.

3.362 NHS London Healthy Urban Development Unit: The NHS London Healthy Urban Development Unit notes that sites SA7.1, SA7.3, and SA7.4 are expected to deliver housing within the next five years. They welcome discussions as soon as possible to address how the healthcare requirements for the area will be accommodated following the anticipated population increase.

3.363 Landowner/Developer: Builder Depot Group supports these allocations but suggests updating the land use requirement to explicitly include employment and/or retail uses.

SA7.2: Aldi, New Southgate (formerly Homebase)

3.364 Transport for London: Comment as above.

3.365 Landowner/Developer: Builder Depot Group supports these allocations but suggests updating the land use requirement to explicitly include employment and/or retail uses.

SA7.3: Ladderswood Estate

3.366 Transport for London: Comment as above.

3.367 Environment Agency: Objection due to flood risk

3.368 NHS London Healthy Urban Development Unit: Observations regarding delivery of new health infrastructure as above.

3.369 Landowner/Developer: New Ladderswood LLP express their support for the allocation but propose amendments to the policy.

SA7.4: Arnos Grove Station Car Park

3.370 Transport for London: Comment as above.

3.371 NHS London Healthy Urban Development Unit: Observations regarding health infrastructure as above.

3.372 Residents/Businesses: A number of residents objected to the loss of car parking from the permitted scheme.

SA7.5: Coppice Wood Lodge

3.373 Transport for London: Comment as above.

PL8 Palmers Green

SA8.1: Morrisons, Palmers Green

3.374 Transport for London: Comment as above.

3.375 Historic England: Comments regarding the wording around significance of listed buildings.

3.376 Thames Water: Ground source protection zone noted.

3.377 Environment Agency: The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

SA8.2: Lodge Drive Car Park

3.378 Transport for London: Comment as above.

3.379 Residents/Businesses: A number of residents objected to the loss of car parking on the site.

- 3.380 Thames Water: Ground source protection zone noted.
- 3.381 Environment Agency: The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

SA8.3: Corner of Green Lanes and the North Circular

- 3.382 Transport for London: Comment as above.
- 3.383 Environment Agency: Objection due to flood risk. The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

- 3.384 Thames Water: Ground source protection zone noted.

SA8.4: Travis Perkins, Palmers Green

- 3.385 Transport for London: Comment as above.
- 3.386 Thames Water: Ground source protection zone noted.
- 3.387 Environment Agency: The Environment Agency advises that water bodies near specific developments should be referenced in the site allocation documentation.

PL10 Chase Park

SA10.1: Land at Chase Park

- 3.388 Transport for London: Objection due to supporting infrastructure. TfL does not consider the sites at Chase Park (PL10) SA10.1 – SA10.4, Crews Hill (PL11) SA11.1 – SA11.6, land opposite Enfield Crematorium (RUR.01), and land between Camlet Way and Crescent West, Hadley (RUR.02) suitable for housing. This is due to their poor transport connectivity and the high costs required to provide sustainable transport access comparable to urban sites in the borough. Developing these sites is likely to lead to car-dependent development, which is contrary to the Good Growth objectives of the London Plan and the NPPF.
- 3.389 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.390 Sport England: Objection due to loss of equestrian sports facilities. Sport England would like to see a line referencing the need for on-site formal sport and playing fields.
- 3.391 Neighbouring authorities: Support from HCC Flood, but with comments
- 3.392 Landowner/Developer: Comer Homes supports the allocation of Chase Park, including Vicarage Farm, as a key placemaking area to help meet Enfield's housing targets, particularly for family and affordable housing. Support from the London Diocese Fund. Concerns from 200 Enfield Road that sites have not been optimised. Landsdown Land, promoting the Trent Park Equestrian Centre support the approach of densities across the site with the higher densities in the parts of the site with best access to public transport and facilities.
- 3.393 Politicians/Local/National Interest Groups: The Enfield Society's concerns about Policy PL10: Chase Park focus on the significant harm that development on both sides of Enfield Road would cause to the semi-rural character of the area and the sense of separation between Enfield Town and Oakwood. They highlight ENPlan's assessment that the high-density, up to 4-5 storey core of the development would have a major adverse visual impact, particularly on high-sensitivity receptors using the London Loop. Additionally, the development would surround the Merryhills Way with housing, compromising its rural character and value as a local open space. The Society also raises concerns about the potential development of the

Trent Park Equestrian Centre, which they argue is inappropriate for the Trent Park Conservation Area due to its rural nature. Enfield Road Watch's response to the local plan highlights several concerns. They dispute Design Principle D's characterisation of Enfield Road as a "highways dominated space," emphasising its urban-rural interface and separation between Enfield Town and Oakwood. They question the replacement of the 2021 Green Belt study, arguing the fields south of Enfield Road should qualify as a Site of Importance for Nature Conservation due to their ecological richness. The response also underscores the area's historic significance, criticises the plan for not respecting local character and design codes, and opposes including Trent Park Equestrian Centre in the development area due to its recreational and historical value.

- 3.394 Residents/Businesses: Residents expressed concern about the lack of consideration for the likely multi-period buried archaeological resources in the development area, particularly prehistoric archaeology evidenced in other parts of Enfield Chase. They recommend that the Masterplan include a comprehensive archaeological assessment based on fieldwork. Additionally, while welcoming the proposal to create a heritage park at the former Slades Hill army camp and AA gun site, they stress the necessity of full archaeological documentation and possible excavation prior to development for effective site interpretation.

SA10.2: Arnold House (66 Ridgeway) and land to the rear of 66 The Ridgeway (west)

- 3.395 Transport for London: Objection as above.
- 3.396 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.397 Neighbouring authorities: Support, but with comments
- 3.398 Landowner/Developer: Nicholas Holdings Ltd and the consortium of landowners for Site Allocation SA10.2 support the principle of Policy PL10 for Chase Park Placemaking Area, Capel Manor College support the strategic allocation and the critical linkage provided by their site but expressed concerns about the placemaking diagram. Geras Estates limited support the local plan.
- 3.399 Politicians/Local/National Interest Groups: Enfield Road Watch's response to the Local Plan expresses concerns about the handling of the planning application for Arnold House's demolition. They argue the access road to the proposed Chase Park development was not transparently communicated, potentially harming the Vicarage Farm and Rifles Site SINC, contradicting NPPF Paragraph 185a. Additionally, they claim the area's slope and gradient do not support active travel, making the development unsustainable. The Local Councillor highlights concerns about limited public transport, increased traffic congestion, and significant harm to the area's character and countryside. The development would urbanise the Enfield Chase Area of Special Character, impacting the Trent Park Conservation Area and historic landscape. It also notes the loss of green spaces that contribute to physical and mental health, as emphasised by Historic England. The proposal is deemed unsound and recommended for deletion from the draft plan. The Barnet Society objects to any erosion of the Green Belt, particularly the loss of the green buffer between Barnet and Enfield. This buffer is crucial for maintaining the distinct identities of Barnet, Hadley, Cockfosters, and Enfield Town, preventing their merge into a single suburban area. These countryside areas, especially north and south of Hadley Road and Enfield Road, are vital for preserving the character and separation of these communities.

- 3.400 Residents/Businesses: Numerous objections.

SA10.3: Chase Park North East

- 3.401 Transport for London: Objection as above.

- 3.402 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.403 Thames Water: Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure.
- 3.404 Neighbouring authorities: Support, but with comments
- 3.405 Politicians/Local/National Interest Groups: Enfield Road Watch's response to the local plan highlights several concerns regarding the extension of Trent Country Park. They argue that Vicarage Farm already serves as an extension to the historic park, preserving its landscape setting and providing wildlife habitats. The creation of new viewpoints would replace valued rural views with urbanised landscapes. Additionally, they emphasise that the topography of site SA10.3 discourages active travel due to slopes and gradients, making it likely car-dependent and thus unsustainable.
- 3.406 Residents/Businesses: Numerous objections.

SA10.4: Chase Park North West

- 3.407 Transport for London: Objection as above.
- 3.408 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.409 Neighbouring authorities: Support, but with comments
- 3.410 Politicians/Local/National Interest Groups: The Enfield Society raises concerns that new neighbourhoods in areas SA10.3 and SA10.4 are being planned with the assumption of a new bus route through the Country Park extension to meet the 400m maximum distance to a bus stop as required. They argue that proximity to a bus stop does not guarantee effective public transport access, particularly as details about the destinations and frequency of the proposed service are unclear. Additionally, any new service might require passengers to change buses at Chase Farm Hospital, raising doubts about the overall efficacy of the proposed public transport provision. Herts and Middlesex Wildlife trust object to the site allocation.
- 3.411 Residents/Businesses: Numerous objections.

PL11 Crews Hill

SA11.1: Land at Crews Hill

- 3.412 Transport for London: TfL does not consider the sites at Chase Park (PL10) SA10.1 – SA10.4, Crews Hill (PL11) SA11.1 – SA11.6, land opposite Enfield Crematorium (RUR.01), and land between Camlet Way and Crescent West, Hadley (RUR.02) suitable for housing. This is due to their poor transport connectivity and the high costs required to provide sustainable transport access comparable to urban sites in the borough. Developing these sites is likely to lead to car-dependent development, which is contrary to the Good Growth objectives of the London Plan and the NPPF.
- 3.413 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.414 Sport England: Objection due to loss of golf facilities.

- 3.415 Neighbouring authorities: HCC's response highlights that the site contains areas of the main river Turkey Brook, which drains areas of Hertfordshire. Any new outfalls must restrict discharge rates and volumes to greenfield levels to ensure upstream areas in Hertfordshire can drain effectively. The site also includes areas within Flood Zone 2 and 3, and HCC recommends consulting the Environment Agency on any proposals for this site. Hertfordshire County Council (HCC) views the Crews Hill development proposal (PL11, SA11.1-SA11.6) as slightly negative for Hertfordshire's ecology, reducing semi-natural habitats' extent and connectivity. While the current landscape has limited ecological value due to intensive farming, the development may alter mixed land uses and degrade some ecological characteristics but could enhance others through Biodiversity Net Gain initiatives. Potential indirect impacts include increased visitor pressure on Hertfordshire's rural sites. The extent of these impacts depends on the Green Infrastructure (GI) proposals for Crews Hill.
- 3.416 Landowner/Developers: Taylor Wimpey supports the vision for Crews Hill under Policy PL11. Rockwell's concerns with Policy PL11 and its associated site allocation SA11.6 centre on its current ineffectiveness and the broader implications for delivery and viability. They emphasise their investment in the ELP and support for the Crews Hill allocation but express significant concerns regarding the uncertainty surrounding the development of Kings Oak Equestrian Centre, which hinges on obtaining clarity from the London Borough of Enfield (LBE). They argue for the Green Belt release of parts of Crews Hill due to their previously developed status and low contribution to Green Belt purposes. Additionally, Rockwell highlights challenges related to the local centre's delivery, which depends on LBE's agreement, and the problematic long-term lease on Kings Oak Farm, which impedes financing and timely development. They call for clearer policy guidance and LBE's commitment to resolve these issues and ensure the site's effective delivery.
- 3.417 Politicians/Local/National Interest Groups: The Enfield Society is concerned that the proposed 800 homes at the site near Crews Hill will harm the historic and natural landscape. They argue it will suburbanise Owls Hall, a Grade II listed asset, causing substantial harm to its setting. The development breaches the boundary provided by the railway line and extends into open countryside, negatively impacting the scenic quality, tranquillity, and sense of remoteness of Enfield Chase. ENPlan's assessment highlights the significant adverse visual effects and landscape harm this development would cause, suggesting the area should remain undeveloped to preserve its openness. Enfield Road Watch raises concerns about the Local Plan regarding Land North of Cattlegate Road, questioning the feasibility and viability of a new road bridge over the railway and arguing that even with bus access, the potential for sustainable transport is poor. They state that existing trees and buffers are inadequate to preserve the countryside setting and that the development would significantly urbanise the countryside. They also note that heritage impacts on the Grade II listed Owls Hall have not been clearly assessed. The Barnet Society supports concentrating new development around Crews Hill Station and retaining the area's horticultural and food-producing industries. However, they express strong reservations about the commercial viability of Crews Hill's businesses due to rising land values and traffic congestion. They request a commitment in the Plan to protect these businesses. Additionally, they stress the need for significant rail, road, and other transport improvements to accompany any development, noting a lack of detailed proposals for Crews Hill in Enfield's Strategic Policies T1, T2, and T3.
- 3.418 Residents/Businesses: Numerous objections.
- SA11.2: Land South of Cattlegate Road, Crews Hill
- 3.419 Transport for London: Objection as above.
- 3.420 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

- 3.421 Sport England: Objection due to loss of playing fields.
- 3.422 Neighbouring authorities: Support, but with comments
- 3.423 Landowners/Developers: London Borough of Enfield Strategic Property Services (LBE SPS) supports the spatial vision and strategic objectives of the draft Local Plan, particularly for Crews Hill. They endorse the inclusion of placemaking areas as key components of the spatial strategy and support the vision for CHPA, advocating flexibility to exceed the 5,500-home target as detailed design progresses. They suggest a unified housing figure across documents, recognise the Council's role in collaboration, and emphasise the importance of phased development and ecological protection. They also recommend a flexible masterplan approach to expedite housing delivery and advocate for clear phasing details and viability considerations.
- 3.424 Politicians/Local/National Interest Groups: The Enfield Society raises several concerns about the proposed development at Crews Hill. They argue that the area, designated as a Borough Site of Importance for Nature Conservation, includes rare acid grassland habitat, making it unsuitable for development. They highlight that the Green Belt Study indicates 'Very High' harm from releasing this area, despite some suggested mitigations. They emphasise the strategic importance of this land, purchased to be preserved as Green Belt, and reference the NPPF's directive to protect valued landscapes, asserting that development would contradict these guidelines and harm the area's historic and recreational value. Enfield Road Watch raises concerns about the proposed development on land south of Cattlegate Road, emphasising the ecological and historical value of Crews Hill Golf Course and King's Oak Plain. They argue that breaching the strong Green Belt boundary is unjustified and would lead to urban sprawl. The designation of Crews Hill Golf Course as a Grade 1 Borough SINC highlights its unique acid grassland habitat, which is irreplaceable. They question the feasibility of development without harming the ecological integrity of the area, citing conflicting expert opinions on ecological impact.
- 3.425 Residents/Businesses: Lea Valley Growers Association object to the loss of popular garden centres and supporting businesses in Crews Hill for housing development. They advocate enhancing horticultural activities to make it a hub for food and plant production. They argue that Enfield's housing targets can be met on brownfield sites, as evidenced in the "Space to Build" report, which identifies locations for 37,000 homes. They emphasise the Green Belt's value for environmental, ecological, economic, and public health reasons, urging the Council to protect it in line with the London Plan and NPPF. Numerous other objections.

SA11.3: Land South of M25, Crews Hill

- 3.426 Transport for London: Objection as above.
- 3.427 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.428 Neighbouring authorities: Support, but with comments
- 3.429 Landowner/Developer: The Paddington Corporation, promoters of Homewood Farm, located within Site Allocation SA11.3 'Land South of M25, Crews Hill,' highlighted their site for its potential to support both residential and commercial development. Tile Kiln Farm highlighted their site's potential to support both residential and commercial development.
- 3.430 Politicians/Local/National Interest Groups: Enfield Road Watch's response to the local plan for Land South of M25 raises concerns about the proposed 440 new homes likely to be occupied before the Local Centre is established, fostering car-dependency and conflicting with the London Plan's objectives. They question the feasibility and scale of the Local Centre, which may be insufficient for 5,500 homes. The Enfield Characterisation Study highlights the area

as part of the historic Theobalds Estate and a "valuable green gateway," deeming it unsuitable for development. The Enfield Society's concerns regarding the development at Crews Hill focus on the impact on the Grade II* listed building, The Paddocks, and its associated barns. Their Heritage Impact Assessment (HIA) indicates that the development would sever The Paddocks from its historical agricultural landscape, causing substantial harm to its setting and significance. The proposed new road and housing would erode the remnants of Theobalds Park, negatively impacting the legibility and understanding of the farmstead. This conflicts with Local Plan policies and NPPF paragraph 206, which requires clear justification for any harm to heritage assets.

- 3.431 Residents/Businesses: Numerous objections.

SA11.4: Land North and South of Cattlegate Road

- 3.432 Transport for London: Objection as above.

- 3.433 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.

- 3.434 Neighbouring authorities: Support, but with comments

- 3.435 Landowner/Developer: GF Planning, on behalf of their client confirms the landowners are working together and confirms that the sites are suitable (SA11.5: Land East of Theobalds Road Park, Crews Hill and SA11.4: Land North and South of Cattlegate Road). Wolden Garden Centre Ltd note the site, which includes Wolden Garden Centre, is situated near Crews Hill Railway Station and falls within a broader area designated for around 2,250 new homes, public spaces, and a new local centre. The comments highlight concerns about the impact of strategic infrastructure requirements and off-site school construction on development viability, noting that these could affect early phases of the project. They suggest updating the site allocation to offer more flexibility on infrastructure contributions and affordable housing to enhance viability. The company also advocates for including diverse residential uses and higher density development options to optimise the site's potential. They emphasise the importance of a viable and comprehensive development approach for Crews Hill to align with long-term planning goals and ensure the success of the area's transformation. Lee Valley Growers association objected as above.

- 3.436 Politicians/Local/National Interest Groups: The Enfield Society's concerns about the land north and south of Cattlegate Road in Crews Hill include potential delays in delivering the Local Centre, which could increase car-based trips and affect rural lanes. They question the effectiveness of a comprehensive masterplanned approach due to the complexity and number of landowners. They also highlight the visual impact of taller buildings and the intrusion into views from The Ridgeway. Furthermore, the necessity for exceptional circumstances to introduce new development in the Greenbelt area is emphasised, with a suggestion to consider the vacant site adjacent to the Plough Public House. Enfield Road Watch's response to the local plan for Land North and South of Cattlegate Road raises concerns about the feasibility and effectiveness of the proposal for 2,250 new homes and a new Local Centre. They argue that the policy is unlikely to be effective due to the lack of landowner cooperation and unclear financial resources for land acquisition or compulsory purchase orders (CPO). The response highlights the risk of piecemeal development due to vague phasing timeframes and insufficient clarity on deliverable sites. Concerns are also raised about ecological impacts on the Glasgow Stud SINC and potential disruption to local businesses.

- 3.437 Residents/Businesses: Numerous objections.

SA11.5: Land East of Theobalds Road Park, Crews Hill

- 3.438 Transport for London: Objection as above.

- 3.439 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.440 Neighbouring authorities: Support, but with comments.
- 3.441 Landowner/Developer: GF Planning, on behalf of their client confirms the landowners are working together and confirms that the sites are suitable (SA11.5: Land East of Theobalds Road Park, Crews Hill and SA11.4: Land North and South of Cattlegate Road).
- 3.442 Politicians/Local/National Interest Groups: The Enfield Society's concerns regarding the land east of Theobalds Park Road include potential significant harm to the Glasgow Stud SINC due to unclear development limits, lack of clarity on new green spaces, and potential ineffectiveness due to uncertain landowner intentions. While the creation of a new park near the Whitewebbs Transport Museum is supported, residential development could harm the rural character of Whitewebbs Road. Development should avoid the SINC to maintain ecological integrity, and more detailed plans are needed for clear decision-making.
- 3.443 Residents/Businesses: Numerous objections.
- SA11.6: Land South West of Theobalds Park Road
- 3.444 Transport for London: Objection as above.
- 3.445 Environment Agency: Objection due to flood risk. The Environment Agency also advises that water bodies near specific developments should be referenced in the site allocation documentation.
- 3.446 Neighbouring authorities: Support, but with comments.
- 3.447 Landowner/Developer: Rockwell London Ltd, a housebuilder with interests in the Crews Hill Allocation (Policy PL11, SA 11.6), supports the plan's vision for delivering new homes and infrastructure at Crews Hill. They welcome the Green Belt release and the plan's ambition to create a sustainable new community. Rockwell has engaged with the Council through Developer Forums and is committed to working with other promoters within SA11.6. However, Rockwell raises concerns about the viability of the plan, the timing and scope of the Supplementary Planning Document (SPD), and transparency regarding delivery assumptions. They believe the plan can be improved through modifications, including refining the SPD, reviewing viability evidence, including a detailed housing trajectory, and ensuring continued commitment from Enfield Estates. London Borough of Enfield Strategic Property Services (LBE SPS) highlights the potential of Sunbeam Stud for development within the CHPA, emphasising its logical location and ability to contribute to Enfield's strategic objectives. They note the site's omission from the phasing and density plans and recommend its inclusion to optimise housing delivery. LBE suggests the site, which is 7.38 hectares, could support around 369 new homes at a density of 50 dph. They advocate for early development within the plan period and seek a more detailed breakdown of the expected development from the Council.
- 3.448 Politicians/Local/National Interest Groups: The Enfield Society's concerns about the land southwest of Theobalds Park Road include the unclear designation of the Clay Hill Conservation Area in planning maps, with potential removal from the Green Belt. They worry about the proposed development's impact on the rural character of Wildwoods and Flash Lane. Additionally, they fear urbanisation along Strayfield Road, which could harm the attractive rural character of the London LOOP and Hertfordshire Chain Walk paths.

Other sites outside of Placemaking Areas

Urban Area

Residential Sites

URB.01: Land known as Brimsdown Sports Ground

- 3.449 Transport for London: Comment as above.
- 3.450 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.
- 3.451 Sport England: Objection due to potential loss of sports facilities.

URB.02: Cockfosters Station Car Park

- 3.452 Transport for London: Comment as above.
- 3.453 Historic England: Comment Landowner/Developer: Support, but with comments
- 3.454 Residents/Businesses: Objection due to loss of car parking as a result of the consented scheme.

URB.03: Former Chase Farm Hospital

- 3.455 Transport for London: Comment as above.
- 3.456 Residents/Businesses: Numerous residents responded raising concerns around the impact of the permitted scheme on the historic clock tower on the site, and other historic buildings.

URB.04: Blackhorse Tower, Cockfosters Road

- 3.457 Transport for London: Comment as above.

URB.05 New Avenue Estate

- 3.458 Landowner/Developer: Vistry Group supports the draft site allocation for the New Avenue Estate (SA URB.05) but requests amendments to better reflect existing planning permissions.

URB.06: Former Middlesex University, Trent Park

- 3.459 Historic England: Comment regarding historic park management plans.

URB.07: Sainsburys, Green Lanes

- 3.460 Transport for London: Comment as above.
- 3.461 Politicians/Local/National Interest Groups: Objection
- 3.462 Residents/Businesses: Objection

URB.08: Hoe, Eastfield, Cherry and Bouvier Estates

- 3.463 Transport for London: Comment as above.

URB.09: Exeter Road Estate

- 3.464 Transport for London: Comment as above.

URB.10: Alma Estate

- 3.465 Transport for London: Comment as above.
- 3.466 Landowner/Developer: Vistry Group supports the draft site allocation for the Alma Estate (SA URB.10) but requests updates to reflect their ongoing development and potential for 1,404 homes with buildings up to 17-storeys.
- 3.467 Politicians/Local/National Interest Groups: Objection

URB.11 The Former Royal Chace Hotel

- 3.468 Thames Water: Comments as above.

URB.12: 241 Green Street

- 3.469 Transport for London: Comment as above.
- 3.470 Environment Agency: Objection due to flood risk.
- 3.471 Politicians/Local/National Interest Groups: Objection

URB.13: Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate

- 3.472 Transport for London: Comment as above.
- 3.473 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

URB.14: Four Hills Estate, Lavender Hill

- 3.474 Transport for London: Comment as above.

URB.15: Kettering Road Estate

- 3.475 Transport for London: Comment as above.
- 3.476 Environment Agency: Objection due to flood risk.

URB.16: 188-200 Bowes Road

- 3.477 Transport for London: Comment as above.

URB.17: Main Avenue Site

- 3.478 Transport for London: Comment as above.

URB.18: Land at Ritz Parade

- 3.479 Transport for London: Comment as above.
- 3.480 Residents/Businesses: Objection due to traffic impacts.

URB.19: Albany Leisure Centre and Car Park

- 3.481 Transport for London: Comment as above.

URB.20: Cuckoo Hall Lane Estate

- 3.482 Transport for London: Comment as above.
- 3.483 Environment Agency: Objection due to flood risk.
- 3.484 Thames Water: Noted need for water supply upgrades.

URB.21: Moorfield Health Centre

- 3.485 Transport for London: Comment as above.
- 3.486 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

URB.22: Oakwood Station Car Park

- 3.487 Transport for London: Comment as above.
- 3.488 Landowner/Developer: Places for London strongly welcome Enfield's inclusion of the Oakwood Station Car Park as a Draft Site Allocation
- 3.489 Politicians/Local/National Interest Groups: The Enfield Conservative Group opposes to the proposal to develop Oakwood Station Car Park for housing, as it represents overdevelopment based on unrealistic housing targets.
- 3.490 Residents/Businesses: Numerous residents objected to the proposals due to the loss of car parking on the site.

URB.23: Stoneleigh Avenue Estate

- 3.491 Transport for London: Comment as above.
- 3.492 Thames Water: Ground source protection zones noted and need for potential upgrades to water supply network in the area.

URB.24: Fore Street Estate

- 3.493 Transport for London: TfL welcomes the requirement for the development to contribute towards bus re-routing, future upgrades to bus capacity, and access improvements at Silver Street station to create an accessible route to the platform. They also support the requirement for the development to minimise parking.
- 3.494 Thames Water: Noted need for water supply upgrades and Ground Source protection zone.

URB.25: Pevensey Avenue

- 3.495 Transport for London: Comment as above.
- 3.496 Thames Water: Ground source projection zones noted.

URB.26: Fords Grove Car Park

- 3.497 Transport for London: Comment as above.
- 3.498 Politicians/Local/National Interest Groups: The Enfield Conservative Group objects to the loss of Ford's Grove Car Park, as it would harm the viability of the Green Lanes area by reducing parking for shoppers.

- 3.499 Residents/Businesses: Residents object to the excessive number and height of proposed dwellings at the site, citing incompatibility with infrastructure and design requirements in SA URB 26. Residents doubt the feasibility of the active travel objective, foresee parking issues, and highlight the negative impact on local businesses due to the loss of the current car park and increased on-street parking.

URB.27: South Street

- 3.500 Transport for London: Comment as above.
- 3.501 Thames Water: Ground source projection zones noted.
- 3.502 Industrial Sites

URB.28 Land to the East of Stockingswater Lane

- 3.503 Transport for London: Comment as above.
- 3.504 Environment Agency: Objection due to flood risk.
- 3.505 Landowner/Developer: Areli Developments Limited welcomes the inclusion of site allocation URB.28 but suggests several clarifications and amendments.

URB.29 Land to the south of Milmarsh Lane, Brimsdown Industrial Estate

- 3.506 Transport for London: Comment as above.
- 3.507 Environment Agency: Objection due to flood risk.

URB.30: Montagu Industrial Estate

- 3.508 Transport for London: Comment as above.
- 3.509 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.
- 3.510 Thames Water: Ground source protection zones noted and need for potential upgrades to water supply network in the area.
- 3.511 Landowner/Developer: Support, but with comments

URB.31: Snowbird Foods Extension

- 3.512 Transport for London: Comment as above.
- 3.513 Thames Water: Ground source protection zones noted and need for potential upgrades to water supply network in the area.

URB.32: Claverings Industrial Estate

- 3.514 Transport for London: Comment as above.
- 3.515 Environment Agency: Objection due to flood risk.
- 3.516 Landowner/Developer: While Danescroft supports the redevelopment principle, they identify conflicts with the Council's design principles, citing boundary inconsistencies, level differences, and unrealistic intensification targets.

URB.33: 6 Morson Road

3.517 Transport for London: Comment as above.

3.518 Environment Agency: Objection due to flood risk.

URB.34: 5 Picketts Lock Lane

3.519 Transport for London: Comment as above.

3.520 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

3.521 Landowner/Developer: Whilst CCLA/LAMIT is supportive of the allocation for industrial uses, the emphasis on 'intensification' and specifying an uplift in floorspace of 2,297sqm is deemed inappropriate and unjustified in the context of the NPPF tests of Soundness.

URB.35 River Walk Business Park

3.522 Thames Water: Thames Water comments that the scale of development in the catchment area will likely necessitate upgrades to the water supply network infrastructure.

3.523 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.

Other uses

URB.36: Church Street Recreation Ground

3.524 Transport for London: Comment as above.

3.525 Sport England: Objection due to loss of sports facilities/playing fields.

3.526 Environment Agency: Note that the site is in a Ground Source Protection Zone and there are requirements associated with this particularly in relation to burial uses.

3.527 Politicians/Local/National Interest Groups: Objection from Enfield's Conservative Group on the basis the development would contravene the NPPF due to loss of open space, traffic and safety and environmental risks. They also question the need for a new facility. The Edmonton and Winchmore Hill Conservative Association objects to the proposal for a crematorium on Church Street Recreation Ground, arguing it fails to meet soundness criteria due to its adverse impact on the community, policy conflicts, and insufficient infrastructure planning. Bush Hill Park Residents Association object to the inclusion of The Church Street Recreation Ground, as it is designated as Metropolitan Open Land, should receive the same level of protection as Green Belt land.

3.528 Landowners/Developers: LBESPS supports the allocation of Church Street Recreation Ground (SA URB.36) for a crematorium, emphasising the importance of detailed design.

3.529 Residents/Businesses: Residents object to Policy URB.36 concerning Church Street Recreation Ground, arguing that it is metropolitan land and should have the same protection as green belt land. They believe that any development on this site would undermine its protected status and compromise the integrity of this valuable green space.

Outside of Placemaking Areas - Rural

Residential Sites

RUR.01: Land opposite Enfield Crematorium (known as The Dell), Great Cambridge Road

- 3.530 Transport for London: Comment as above.
- 3.531 Landowner/Developer: Forty Leisure Limited and Jubilee Church are supportive of the Local Plan's allocation of Site SA RUR.01 (Land Opposite Enfield Crematorium).
- 3.532 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.
- 3.533 Local Interest Groups: The Enfield Society's concerns regarding the proposed development on this Green Belt and open space site highlight the inconsistency with London Plan Policy G1, which protects such areas. They question the adequacy of the heritage impact assessment, especially regarding views from Forty Hill Conservation Area, and the lack of detailed evidence, such as Vu City's modelling. Additionally, concerns are raised about the delayed implementation due to potential environmental permits, suggesting that an earlier survey could clarify the timeframe for delivering the proposed 291 dwellings.

RUR.02: Land between Camlet Way and Crescent West, Hadley Wood

- 3.534 Transport for London: Comment as above.
- 3.535 Neighbouring authorities: LB Barnet is concerned that this development could detrimentally affect the Green Belt's openness.
- 3.536 Landowner/Developer: The Duchy of Lancaster supports the draft plan and the site allocation with comments. LBESPS supports the allocation of land between Camlet Way and Crescent Way (SA RUR.02) for new homes, emphasising sustainable design that respects the surrounding Green Belt and SINC. They endorse early engagement with Historic England and Thames Water due to the site's location in an Archaeological Priority Area and potential wastewater network upgrades. They agree with the estimated capacity of 160 new homes and the 10-year development timeframe. The site is seen as a deliverable location that can significantly contribute to the Borough's housing needs and should be prioritised for residential development.
- 3.537 Politicians/Local/National Interest Groups: The Enfield Conservative Group, Neighbourhood Planning Forum other local interest groups such as the Barnet and Enfield Societies submitted extensive objections to the site's release from the green belt for residential development, questioning the exceptional circumstances and sustainability of the site.
- 3.538 Residents/Businesses: Residents submitted extensive objections to the site's release from the green belt for residential development, questioning the exceptional circumstances and sustainability of the site.

Industrial Sites

RUR.03: Land west of Rammey Marsh

- 3.539 Transport for London: Comment as above.
- 3.540 Environment Agency: Objection based on incorrect flood zone mapping.
- 3.541 Lee Valley Regional Park Authority: Support, but with comments
- 3.542 Neighbouring authorities: Broxbourne Borough Council has raised concerns about the accuracy of Enfield's traffic modelling, especially regarding the impact of 5,500 new dwellings at Crews Hill and the proposed employment allocation west of Rammey Marsh. Broxbourne's previous transport modelling indicated that several junctions would be operating at or near capacity by 2033, which contrasts sharply with Enfield's lower congestion projections.

Broxbourne fears this discrepancy may undermine planned transport interventions on the A10 and result in severe highway impacts, making this part of the Local Plan unsound. HCC questions whether a mitigation measure at J24 of the M25 is needed to handle growth and increased HGV traffic from the industrial allocation RUR.04 Land East of Junction 24 and welcomes discussion on this. They express concerns about increased traffic volumes and delays on the A10 and A1010 due to industrial allocations off Mollison Avenue (RUR.03 and RUR.05), noting these routes are designated Air Quality Management Areas (AQMAs) and face severe congestion, especially when the M25 is delayed or closed. HCC expects these issues to be investigated through applicable planning applications and supports integrating wording into the plan to ensure this investigation is a policy requirement.

- 3.543 Politicians/Local/National Interest Groups: Enfield Road Watch objects to SA RUR.03: Land West of Rammey Marsh because the land is currently designated as Green Belt and is part of the Lee Valley Area of Special Character. They emphasise that the area is rich in wildlife and argue that further ecological surveys are needed to understand its significance better. CPRE London opposes the development of Green Belt land west of Rammey Marsh (SA RUR.03), highlighting its significance to the Metropolitan Green Belt and asserting that Enfield has sufficient brownfield land and existing major sites like Meridian Water for housing development. They emphasise that this protected Green Belt land is designated as part of the Lee Valley Area of Special Character and should not be included as a site allocation.
- 3.544 Residents/Businesses: Objection due to loss of Green Belt.
- RUR.04: Land east of Junction 24, M25
- 3.545 Transport for London: Comment
- 3.546 National Highways Limited: Objection
- 3.547 Neighbouring authorities: HCC's response notes that the proposal for industrial use at SA RUR.04, an arable field within a farmed landscape, is incongruous with its agricultural and landscape context and damaging to the local environment's character. Despite this, there appear to be no ecological constraints locally or within Hertfordshire.
- 3.548 Politicians/Local/National Interest Groups: CPRE London opposes the development of Green Belt land at M25, Junction 24 (SA RUR.04), emphasising its importance to the Metropolitan Green Belt and arguing that Enfield has sufficient brownfield land and existing major sites like Meridian Water for housing development. They assert that development would harm the green gateway to the Borough and that this land, designated as Green Belt, should not be included as a site allocation. Enfield Road Watch objects to SA RUR.04: M25 Junction 24 (The Ridgeway, near St John's School) due to its current designation as Green Belt countryside and an Enfield Chase Area of Special Character within the statutory Development Plan. They argue that the proposed industrial, storage, and distribution centre would destroy the farm fields and countryside views that create a green gateway to the borough.
- 3.549 Residents/Businesses: The Hadley Wood Neighbourhood Planning Forum (HWNPF) raises concerns about the proposed 30,000m² logistics hub on Green Belt land near junction 24 of the M25 (site RUR.04). They argue that its isolated PTAL 1a location means workers will predominantly commute by car, contributing to car dependency. Additionally, given its location in a corner of the borough, the development is likely to benefit residents of Hertsmeare, particularly Potters Bar, more than those in Enfield. HWNPF believes the proposal is driven by financial motives rather than genuine employment needs.
- RUR.05: Land to the north west of Innova Park
- 3.550 Transport for London: Comment

- 3.551 Environment Agency: The Environment Agency notes that development on historic landfills may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.
- 3.552 Lee Valley Regional Park Authority: Support, but with comments
- 3.553 Neighbouring authorities: Support, but with comments
- 3.554 Landowner/Developer: Thames Water supports the allocation of the former Thames Water Rammey Marsh Sewage Sludge beds (SA RUR.05) for employment development and agrees with its removal from the Green Belt and propose amendments to the policy.
- 3.555 Local Interest Groups: The Enfield Society's concerns about the site in the Green Belt highlight that the need for proposed employment uses has not demonstrated the required 'exceptional circumstances' for Green Belt release. The proposed 39m tall buildings are not justified for the intended employment uses. Additionally, Design Principle C should mandate, rather than suggest, the maintenance of a pedestrian connection parallel to the watercourse towards the Small River Lea.

RUR.06: Land at Picketts Lock

- 3.556 Transport for London: Comment
- 3.557 Environment Agency: The Environment Agency notes that development on historic landfills, may require an Environmental Permit for reusing site materials or depositing waste for recovery activities.
- 3.558 National Grid: National Grid has reviewed the ELP and identified that several proposed development sites, including RUR.06 (Land at Picketts Lock), SA5.2 (Meridian Water Phase 2), and SA5.6 (Meridian East - Harbet Road), are crossed or in close proximity to NGET assets. They propose modifications to include site-specific criteria, such as a strategy for responding to NGET overhead transmission lines, ensuring the NGET Design Guide and Principles are applied during masterplanning to reduce the impact through good design.
- 3.559 Lee Valley Regional Park Authority: Support, but with comments
- 3.560 Neighbouring authorities: Support, but with comments
- 3.561 Landowner/Developer: The Wave generally supports the Local Plan as it pertains to their activities but has concerns about the wording of policy SA RUR.06, deeming it unjustified. They suggest specific modifications to address these issues, aiming to make the policy more sound.

Other Uses

RUR.07: Whitewebbs Golf Course

- 3.562 Transport for London: Comment as above.
- 3.563 Environment Agency: Objection due to flood risk.
- 3.564 Sport England: Objection due to loss of playing fields and other sport facilities.
- 3.565 Neighbouring authorities: HCC's response is neutral with observations.
- 3.566 Landowner/Developer: Support, but with comments. Tottenham Hotspur FC (THFC) request extending the allocation to include additional land and updating references to the former Whitewebbs Golf Course. They support the proposed land uses but suggest clarifying terms and aligning the estimated delivery timeframe with current developments. THFC also

suggests modifying design principles to account for practical constraints, such as limiting public access in professional sporting areas and ensuring feasible pedestrian and cycle connections. LBESPS supports the allocation and emphasise the importance of discussions with Sport England and Tottenham Hotspurs, as well as with Historic England due to nearby heritage assets. They support biodiversity enhancements and sustainability-led design. They endorse the proposed development timeframe of up to 10 years, considering the site deliverable and prioritisable for development.

- 3.567 Politicians/Local/National Interest Groups: Enfield Road Watch's objection to SA RUR.07 highlights the Judicial Review challenging Enfield Council's decision to lease land to Tottenham Hotspurs, which they argue compromises the open parkland character and historic value of Whitewebbs. They also emphasize that the Green Belt status makes development inconsistent with national policy, criticise the vague goals regarding public access and heritage assets, and note a shift from nature recovery to sport and leisure uses.
- 3.568 Residents/Businesses: A large number of residents objected to proposals to convert Whitewebbs golf course into a professional sports facility. They argue that the land, bought with public funds in 1931 and designated as public trust land, should remain open to the public. They believe the council's portrayal of the need for "restoration" is misleading. They also raise legal and ethical issues, stating that the proposal would limit public access and primarily benefit a single corporation. They suggest that the land should remain public and be designated as a natural reserve. They also question the ethical validity of biodiversity offsetting and the overall environmental impact of the proposal. They argue that the proposal is neither legally compliant nor sound and call for a review of the proposal.

RUR.08: Sloemans Farm

- 3.569 Environment Agency: Note that the site is in a Ground Source Protection Zone and there are requirements associated with this particularly in relation to burial uses.
- 3.570 Neighbouring authorities: Support, but with comments. HCC's response, which is neutral, highlights that the site is adjacent to the main river Cuffley Brook. Surface water runoff must be managed on-site to ensure that any discharges to Cuffley Brook are restricted, preventing any hindrance to upstream flows.
- 3.571 Landowner: LBESPS supports the allocation of Sloeman's Farm (SA RUR.08) for natural burial use. They endorse the proposed land use, infrastructure requirements for enhanced pedestrian and cycle connectivity, and the development timeframe of up to 5 years. They consider the site deliverable and should be prioritised for development.
- 3.572 Local Interest Groups: The Enfield Society supports additional burial space, provided it minimally impacts the character of Whitewebbs Lane and the open landscape within the sensitive Enfield Chase Area of Special Character. They seek clarity on design principals argue that ancillary buildings, as mentioned in Design Principle G, are inconsistent with Green Belt policy and should not affect the rural character of Whitewebbs Lane.
- 3.573 Residents: One resident objected to the burial needs assessment and case for additional burial space at Sloeman's Farm.

Omission Sites

- 3.574 A number of respondents utilised the opportunity to make a call for sites submission via the Regulation 19 Consultation to further promote additional sites to the council for consideration as part of the Local Plan.